Facility Name: Southwire Company - Carrollton

City: Carrollton
County: Carroll

AIRS #: 04-13-045-00008 Application #: 632967

Date SIP Application Received: September 27, 2022

Date Title V Application Received: September 27, 2022

Permit No: 3357-045-0008-V-05-3

Program	Review Engineers	Review Managers
SSPP	Tyneshia Tate	Heather Brown
SSCP	Sherry Waldron	William Fleming
ISMU	Joshua Pittman	Dan McCain
TOXICS	Sherry Waldron	William Fleming
Permitting P	rogram Manager	Stephen Damaske

Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public comment period and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Existing Permits

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Description
3357-045-0008-V-05-0	April 20, 2018	Title V Renewal
3357-045-0008-V-05-1	August 12, 2019	502(b)(10) Modification to include equipment installed under the cumulative modification exemption and construction and operation of new wire production equipment and new peak shaving engines.
3357-045-0008-V-05-2	September 16, 2021	Significant modification to construct and operate several extruders, printers, armoring lines, drawing machines, bare wire bunchers and PVC compounding equipment and removal of multiple extrusion and drawing line equipment located at the Building Wire Plant [BWP], Metal Clad [MC], and Utility Product Plant [UPP]. The replacement of the rod mill located at the Copper Rod Mill [CRM].

B. Regulatory Status

1. PSD/NSR/RACT

The Cofer Technology Center (formerly AFS No. 04500043), Southwire Copper Rod Mill (AFS No. 04500008), Southwire Corporate Energy Management (formerly AFS No. 04500051), Southwire Machinery Division (formerly AFS No. 04500038), Southwire Carrollton Building Wire Plant (formerly AFS No. 04500012), and Southwire Carrollton Utility Products Plant (formerly AFS No. 04500052) comprise one Title I and Title V site. Formerly, each of these facilities had their own AFS No. and Title V Permit. These facilities currently operate under one AFS (AFS No. 04500008) that covers Southwire Company's entire Carrollton main campus.

The permitted Southwire Company – Carrollton consists of eight distinct entities. The entities are as follows:

- Building Wire Plant [BWP] formerly permitted as Southwire Company Carrollton Building Wire Plant
- MC [Metal Clad] Plant– formerly permitted as Southwire Company Machine Services
- Copper Rod Mill [CRM] formerly permitted as Southwire Company Copper Rod Mill
- Utility Products Plant [UPP] formerly permitted as Southwire Company Carrollton Utility Products Plant
- Machine Services Group [MSG] formerly permitted as Southwire Company Machine Services
- Cofer Technology Center [CTC] formerly permitted as Southwire Company Cofer Technology Center
- Corporate Energy Management [CEM] formerly permitted as Southwire Company Corporate Energy Management
- Southwire Tools and Assembled Products [TAP] facility located at 840 Old Bremen Road (added per Title V Permit Number 3357-045-0008-V-04-5)

The collective operations of the former Southwire Company – Carrollton Building Wire Plant and other Southwire facilities discussed above are considered a "major source" under Title I PSD regulations.

The former Southwire Utility Products Plant Permit No. 3357-045-0052-V-01-1, issued June 3, 2002, included a NO_x emissions cap on the boilers which served to limit NO_x emissions below 100 tons per year for the entire Title I site. This NO_x emissions limit was classified as a Georgia Rule 391-3-1-.02(2)(yy) Avoidance Limit. Since the last Title V Renewal, the Boilers P296 and P297 have been permanently decommissioned; therefore this limit is no longer applicable.

Per Permit 3351-045-0008-V-02-2, the former Southwire Company Copper Rod Mill received PSD avoidance limits of 9.9 tons per year for PM/PM₁₀ emissions and 39.9 tons per year for VOC emissions related to a modification.

Per Permit 3351-045-0008-V-02-3, the former Southwire Company Copper Rod Mill modified PSD avoidance limits established by Permit Number 3351-045-0008-V-02-2 for PM/PM₁₀ emissions to 14 tons per year and VOC emission to 39 tons per year. In addition, PSD avoidance limits were established for PM_{2.5} emissions to 14 tons per year.

Per Permit 3357-045-0052-V-01-3, the former Southwire Company – Carrollton Utility Products Plant received PSD avoidance limits of 9.9 tons per year for PM/PM₁₀ emissions and 39.9 tons per year for VOC emissions related to a modification.

Per Permit 3357-045-0052-V-01-5, the former Southwire Company – Carrollton Utility Products Plant modified PSD avoidance limits established by Permit Number 3357-045-0052-V-01-3 for PM/PM_{10} emissions to 14 tons per year and VOC emission to 39 tons per year. In addition, PSD avoidance limits were established for $PM_{2.5}$ emissions to 14 tons per year.

Per Permit 3357-045-0012-V-01-3, the former Southwire Company – Carrollton Building Wire Plant received PSD avoidance limits of 9.9 tons per year for PM/PM₁₀ emissions and 39.9 tons per year for VOC emissions related to a modification.

Per Permit 3357-045-0012-V-01-5, the former Southwire Company – Carrollton Building Wire Plant modified PSD avoidance limits established by Permit Number 3357-045-0012-V-01-3 for PM/PM₁₀ emissions to 14 tons per year and VOC emission to 39 tons per year. In addition, PSD avoidance limits were established for PM_{2.5} emissions to 14 tons per year.

Per Permit 3499-045-0038-02-3, the former Southwire Company – Machine Services received PSD avoidance limits for PM/PM₁₀ related to a modification.

As part of the Title V renewal, Southwire updated its RACT Plan to include applicable equipment. VOC RACT was determined as follows.

1. Copper Rod Mill –

- Operate the Vapor Capture System during all periods of operation of the Rod Mill Quenching and Cooling System.
- Route any vapor from the Vapor Capture System to the Rod Mill Shaft Furnace for combustion/destruction purposes. During such periods, the Rod Mill Shaft Furnace shall be operating at a temperature representative of normal source operation.

2. Utility Products Plant –

- Spray Paint Booths: Use of compliant coatings consistent with Georgia Rule (ii).
- Plastic Extrusion Lines and Curing: VOC RACT for these emission units is no additional control measures.
- Ink Application Systems: VOC RACT for these emission units is no additional control measures.
- Ink Wash Stations: The installation of a cover for the station trough and drainage and for the storage of solvents when the ink wash station is not in use.
- Boiler: VOC RACT for this emission unit is no additional control measures. These units have since been decommissioned and were removed in 2016 Title V Renewal.
- Parts Cleaning Oven: VOC RACT for this emission unit is use of integrated afterburner while in operation.

3. Building Wire Plant –

- Plastic Extrusion Lines and Curing: VOC RACT for these emission units is no additional control measures.
- Ink Application Systems: VOC RACT for these emission units is no additional control measures.
- Ink Wash Stations: The installation of a cover for the station trough and drainage and for the storage of solvents when the ink wash station is not in use.
- Parts Cleaning Ovens: VOC RACT for this emission unit is use of integrated afterburner while in operation. Specifically for P690, limit plastic residue burned off to 56 pounds per week.

4. MC Plant and Machine Services Group –

- Spray Paint Booth: Use of compliant coatings consistent with Georgia Rule (ii).
- Strip Coating: VOC RACT for these emission units is use of ultraviolet light-cured coatings.
- Armoring Operations. VOC RACT for these emission units is no additional control measures.
- Plastic Extrusion Lines and Curing: VOC RACT for these emission units is no additional control measures.
- Ink Application Systems: VOC RACT for these emission units is no additional control measures.
- Ink Wash Stations: The installation of a cover for the station trough and drainage and for the storage of solvents when the ink wash station is not in use.

5. Cofer Technology Center –

• Vertical Flame Chamber: VOC RACT for this emission unit is no additional control measures.

6. Corporate Energy Management –

• Internal Combustion Engines: Operation of the non-selective catalytic reduction systems on the peak shaving engines to demonstrate compliance with 40 CFR 63, Subpart ZZZZ is considered VOC RACT. Operation of the emergency ITS generator to demonstrate compliance with 40 CFR 63, Subpart ZZZZ is considered VOC RACT.

Waukesha units are equipped with non-selective catalytic reduction (NSCR) to control
emissions of NOx and VOC. These units must demonstrate compliance with 40 CFR 63,
Subpart ZZZZ is considered VOC RACT. Operation of NSCR is considered RACT for
the Waukesha units.

7. Southwire Company Miscellaneous Sources –

- Spray Paint Booth: Use of compliant coatings consistent with Georgia Rule (ii).
- Strip Coating: VOC RACT for these emission units is use of ultraviolet light-cured coatings.
- Wastewater Treatment Plant Evaporator: VOC RACT for these emission units is no additional control measures. This unit has since been decommissioned.
- Propane Vaporizer: VOC RACT for these emission units is no additional control measures.
- Various Small Fuel Burning Sources: VOC RACT for these emission units is no additional control measures.

8. Tools and Assembled Products –

Per Permit Number 3357-045-0008-V-04-5, Southwire proposed to limit the VOC content for painting operations associated with P970 that utilize air drying to 3.5 pounds of VOC per gallon, excluding water, Alternatively, if a coating containing more than 3.5 pounds of VOC per gallon is used, the solids equivalent must be limited to 6.67 pounds of VOC per gallon of coating solids delivered to the coating applicator. This is the proposed VOC RACT limit with no add on controls. This proposal is consistent with their VOC RACT proposal for similar equipment at the Utility Products Plant. It is also consistent with the requirements of Georgia Rule 391-3-1-.02(2)(ii), should it have been applicable to Blade Coating P790. Since the proposed RACT is consistent with that imposed on existing similar equipment, the Division did not require Southwire to conduct a review of the RACT/BACT/LAER Clearinghouse (RBLC) to determine if VOC control systems have been utilized on processes similar to the painting operations at TAP. Therefore, the Southwire RACT Plan for proposed painting operations will be use of compliant coatings consistent with Georgia Rule 391-3-1-.02(2)(ii) as originally proposed. The Division agrees with Southwire that use of Georgia Rule 391-3-1-.02(2)(ii) compliant coatings which is currently in use for equipment similar to this at Southwire. Therefore, the Division approves the decision that VOC RACT for the Blade Coating P970 is Georgia Rule 391-3-1-.02(2)(ii) compliant coatings. This operation has since been discontinued.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

	Is the Pollutant	If emitted, what is the facility's Title V status for the Pollutant?				
Pollutant	Emitted?	Major Source Status	Major Source Requesting SM Status	Non-Major Source Status		
PM	Y	✓				
PM ₁₀	Y	✓				
PM _{2.5}	Y	✓				
SO_2	Y			✓		
VOC	Y	✓				
NO _x	Y			✓		
СО	Y	✓				
TRS	Y			✓		
H ₂ S	Y			✓		
Individual HAP (methanol)	Y	✓				
Total HAPs	Y	✓				

II. Proposed Modification

A. Description of Modification

In 2021, Southwire Company began to undergo modernization in which the facility is planning to replace many of its current equipment. Title V Operating Permit Amendment Number 3357-045-0008-V-05-2 issued on July 2021 was the first phase of this project and is referred to Modernization 1. The second phase, Modernization 2, is a continuation of the modernization project, which will add and replace additional equipment at the facility. Southwire Company is requesting to make modifications to the Prevention of Significant Deterioration (PSD) avoidance limits previously established in Title V Operating Permit Amendment Number 3357-045-0008-V-05-2 to ensure that PSD avoidance is maintained.

B. Emissions Change

Emission estimates are as discussed in Section 2.0 of the narrative associated with Application 632967 and in Appendix B of Application 632967.

Table 3: Emissions Change Due to Modification

Table 5: Emissions Change Due to Mounication						
	Is the	Net Actual Emissions	Net Potential Emissions			
	Pollutant	Increase (Decrease)	Increase (Decrease)			
Pollutant	Emitted?	(tpy)	(tpy)			
PM	Y	< 17.89	17.89			
PM_{10}	Y	< 14.50	14.50			
PM _{2.5}	Y	< 9.50	9.50			
SO_2	Y	< 0.53	0.53			
VOC	Y	< 39.50	39.50			
NO_x	Y	< 11.54	11.54			
CO	Y	< 55.05	55.05			
TRS	N	-	-			
H ₂ S	N	-	-			
Individual HAP (methyl isobutyl ketone)	Y	< 9.50	9.50			
Total HAPs	Y	< 24.90	24.90			

C. PSD/NSR Applicability

Per Application Number 632967, estimated emissions increases resulting from the project discussed in detail later in this document are less than the PSD thresholds with exception to particulate matter (PM) and volatile organic compounds (VOCs) as discussed below.

Particulate Matter (PM/PM₁₀/PM_{2.5})

According to Application Number 632967, for the Rod Mill the total combined PM potential-to-emit from Modernization 1 was dependent on the effectiveness of Scrubber C4001, resulting in a maximum emission rate limit for the Furnaces F4001 and F4002. To avoid exceeding the PSD threshold, Southwire proposed to install a scrubber unit (C4001) that would reduce PM/PM₁₀/PM_{2.5} emissions by a minimum of 40%.

As part of this same project, Southwire also permitted several extrusion lines, drawing machines, and other equipment that contributed 2.5 tons of PM/PM₁₀/PM_{2.5} emissions. In order to avoid triggering the PSD avoidance limit of 10 tons of PM_{2.5} at the time, the CRM was proposed to be limited to 7.41 tons of PM/PM₁₀/PM_{2.5} per year. To demonstrate compliance with this proposed limit, Southwire was expected to conduct a stack test on the Rod Mill Shaft Furnaces F4001 and F4002 to demonstrate that the emissions would not exceed the hourly equivalent emission rate (1.69 lb/hr) determined as shown below:

$$7.41 \frac{\text{tons}}{\text{year}} \times 2,000 \frac{\text{lb}}{\text{ton}} \times \frac{1 \text{ year}}{8,760 \text{ hour}} = 1.69 \frac{\text{lb}}{\text{hr}}$$

The Division modified the proposed a PM/PM₁₀/PM_{2.5} limit to 7 tons per year for the CRM Shaft Furnaces F4001 and F4002 rather than 7.41 tons per year. The modified emission rate reflected the fact that this was based on an assumed emission control device reduction of PM emissions of 40 percent. Given the basis for the emission limit determination, the additional significant digits as proposed for the limit are believed too many based on the potentially less significant digits for the data inputs used to determine the limits.

In addition, all equipment added as part of Phase 1 at MC Plant, Building Wire Plant, Utility Product Plant, and Copper Rod Mill were added under a 9.9-ton limit (Conditions 3.2.A.4 and 3.2.A.6) for PM/PM₁₀/PM_{2.5} to avoid applicability of PSD to the proposed modification.

As part of this permit modification, Southwire is electing to take a 12.93 tons per year limit on PM₁₀ and 7.93 tons per year limit on PM_{2.5} from both rod and wire manufacturing sources associated with Modernization 1 and 2. The limits listed above consist of two separate emissions tracking combined together to allow for operational flexibility across the plants.

Rod Mill Limit - As described in Modernization 1, the scrubber unit (C4001) was expected to reduce PM/PM₁₀/PM_{2.5} emissions by a minimum of 40% as this was sufficient to reduce PM emissions to avoid triggering PSD at the time. As more equipment are being added during Modernization 2, Southwire is requesting to revise the control efficiency of the scrubber and will design the new scrubber to achieve this performance.

Instead of focusing on the scrubber control efficiency, Southwire is proposing to establish a PM/PM₁₀/PM_{2.5} emissions factor (lb/ton of copper charged) during the initial performance test and use this factor in the equation to track compliance with the 12-month PSD-avoidance emissions limits per Application Number 632967. Per Application Number 632967, Southwire is utilizing an initial controlled PM emissions factor of 0.011 lb/ton of copper charged. Southwire will complete an initial stack test to determine an emission factor. This factor will then be used to calculate monthly PM emissions from the Rod Mill. Southwire will revise this factor upon the completion of each Division-approved performance test. The Division will require the facility to obtain approval of the emission factor proposed resulting from the Division approved performance tests.

Drawing Machine and Extruders Limit - Southwire is electing to take operational limits on all drawing machines and extruders added from both modernization projects to further restrict PM emissions. Southwire will maintain monthly records by tracking production and on-going calculations of these pollutants. As explained above, calculated emissions from these sources will be combined with the rod mill emissions for comparison against the combined PSD-avoidance limit to allow for operational flexibility according to Application Number 632967.

All plastic pellet feeder hopper system proposed in Modernization 2 are required to have dust filters, and the efficiency of these devices is taken into account in the emissions estimates.

All new drawing machines with the capability of drawing aluminum will have an oil mist collector installed to remove PM emissions of at least 90%. According to Application Number 632967, Southwire wishes to conduct stack testing to update the current emission factors.

The Division will propose the following PSD avoidance limits for PM₁₀ and PM_{2.5} emissions associated with the proposed project as indicated in Application Number 632967. As part of this permit modification, Southwire is electing to take a 12.93 tons per year limit on PM₁₀ and 7.93 tons per year limit on PM_{2.5} from both rod and wire manufacturing sources associated with Modernization 1 and 2. The Division will modify the proposed PM₁₀ limit to 12.5 tons per year for the Modernization 1 and 2 project as described in Application Number 632967 rather than 12.93 tons per year. In addition, the Division will modify the proposed PM_{2.5} limit to 7.5 tons per year for the Modernization 1 and 2 project as described in Application Number 632967 rather than 7.93 tons per year. The modified emission rates reflect the fact that the limit was based on an assumed emission control device reduction of PM emissions and the need to perform emission testing to determine Division approved emission factors determined via Division approved source testing. basis for the emission limit determination, the additional significant digits as proposed for the limit are believed too many based on the potentially less significant digits for the data inputs used to determine the limits. The Division will also require operating of dust filters and oil mist eliminators at all times that applicable equipment is operating. The Division proposed monitoring and performance testing associated with PSD avoidance for the proposed modification will be discussed later in this document.

Volatile Organic Compound (VOC)

According to Application Number 632967, the total combined VOC potential-to-emit from this project is dependent on the effectiveness of the VOC control system proposed for the new rod mill cooling and quenching operations. In order to ensure that the project does not exceed the PSD threshold, Southwire proposes to install controls and perform specific monitoring requirements to limit the VOC emissions to be below the required threshold.

In order to demonstrate compliance with this proposed limit, Southwire will use records of the isopropyl alcohol (IPA) used at the rod mill to calculate the total monthly VOC emissions (in tons) from the Rod Mill Shaft Furnaces (F4001 and F4002), and the Rod Mill Quenching and Cooling System (F4003), combined using the following formula:

VOC
$$\left(\frac{\text{tons}}{\text{month}}\right) = \text{U} \times 0.83 \times \left(1 - \frac{\text{D}}{100}\right) \times \text{AF} \times \frac{1 \text{ ton}}{2000 \text{ lbs}}$$

Where.

U = VOC/IPA Usage;

0.83 = A constant used to represent the weight percent VOCs not consumed in the rod pickling/cleaning process;

D = The VOC destruction efficiency of the Rod Mill Shaft Furnace (F4001 and F4002). Southwire proposes to conservatively use 90% for this value;

AF = The availability of the Rod Mill Shaft Furnace (F4001 and F4002)

The new control system will capture all IPA that is not destroyed in the quenching process and route those gases to the furnace for destruction, effectively decreasing the total IPA (VOC) emissions. Unlike the current control system, the new system is being designed as part of the initial design of the rod mill and does not include a chiller component that serves to condense some of the gases and return them to the system.

Therefore, the capture efficiency (C) is increased to 100% (from 83%) entirely removing it from the equation above. Compared to previous years' actual baseline emissions, the new quenching and cooling system should be emitting approximately 15.74 <u>less</u> tons of VOC annually.

Southwire initially proposed a 44.24 tpy VOC limit on future emissions from the Rod Mill. The Division modified the proposed VOC emission limit to 44 tons per year rather than 44.24 tons per year. The modified emission rate reflected the fact that emissions limits were based on IPA usage for VOC. Given the basis for the emission limit determination, the additional significant digits as proposed for the VOC limit was believed too many based on the potentially less significant digits for the data inputs used to determine the limits.

According to Application Number 632967, Southwire is electing to take a 71.19 tons per year limit on VOC from both rod and wire manufacturing. The limit consists of two separate emissions tracking combined together to allow for operational flexibility across the plants.

Rod Mill – According to Application Number 632967, Southwire will maintain monthly records of all IPA usages from the Rod Mill to calculate total VOC emissions as shown in the equation above. As noted previously, these emissions will be combined with the rod mill drawing, extrusion, and printing emissions to allow for operational flexibility.

Drawing Machine, Extruders, and Printers - According to Application Number 632967, Southwire will maintain monthly usages of all inks and on-going calculations of VOC to avoid exceeding this limit. As explained above, these emissions will be combined with the rod mill emissions to allow for operational flexibility.

The Division will propose the following PSD avoidance limits for VOC emissions associated with the proposed project as indicated in Application Number 632967. As part of this permit modification, Southwire is electing 71.19 tons per year limit on VOC from both rod and wire manufacturing. The Division will modify the proposed VOC limit to 71 tons per year for the project as described in Application Number 632967 rather than 71.19 tons per year. The modified emission rate reflects the fact that it was based on an assumed emission control device reduction of VOC emissions and the need to perform emission testing to determine actual control efficiency via Division required and approved source testing. Given the basis for the emission limit determination, the additional significant digits as proposed for the limit are believed too many based on the potentially less significant digits for the data inputs used to determine the limits. The Division will also require operating of control equipment at all times that applicable equipment is operating. The Division proposed monitoring and performance testing associated with PSD avoidance for the proposed modification that will be discussed later in this document.

SIP CONSTRUCTION PERMIT AND TITLE V SIGNIFICANT MODIFICATION APPLICATION REVIEW

III. Facility Wide Requirements

A. Emission and Operating Caps:

No emission and/or operating caps were added, removed or modified as a result of the proposed modification.

B. Applicable Rules and Regulations

Rules and Regulations Assessment – No rules and/or regulations were added, removed or modified as a result of the proposed modification.

Emission and Operating Standards – No emission and/or operating standards were added, removed or modified as a result of the proposed modification.

C. Compliance Status

Application Number 632967 does not address facility wide compliance status.

D. Permit Conditions

No permit conditions were added, removed or modified in Section 2.0 of the permit as a result of the proposed modification.

IV. Regulated Equipment Requirements

A. Brief Process Description

In 2021, Southwire Company began to undergo modernization in which the facility is planning to replace many of its current equipment. Title V Operating Permit Amendment Number 3357-045-0008-V-05-2 issued on July 2021 was the first phase of this project and is referred to Modernization 1. The second phase, Modernization 2, is a continuation of the modernization project, which will add and replace additional equipment at the facility. Southwire Company is requesting to make modifications to the Prevention of Significant Deterioration (PSD) avoidance limits previously established in Title V Operating Permit Amendment Number 3357-045-0008-V-05-2 to ensure that PSD avoidance is maintained.

Table 1-2, included in Application Number 632967, lists all equipment proposed to be added and removed during the first phase of the project as detailed in the permit application.

Equipment	Modern	ization 1	Modernization 2		
Equipment	Qty Added	Qty Removed	Qty Added	Qty Removed	
Armoring Lines	11		13		
Boilers	3		2 or 10	2	
Cooling Towers			16	2	
Curing Ovens	10	4			
Drawing Machines	9	4	11	10	
Emergency Generator	1		1		
Extrusion	27	28	27	3	
Generators			2	3	
Misc.		Vario	ıs		
Printers	34		94		
Propane Vaporizers			2	None	
Rod Mill Furnace	Copper Rod Mill	Furnace and Quenci	hing Cooling Syste	em is Replaced	
PVC Compounding Lines	3				
Silo	3		4		
Storage Tanks			1		
Surface Coating				1	

Table 1-2. Modernization 1 Equipment Changes (V-05-2)

Application Number 632967 provides more detailed descriptions for all equipment proposed in Modernization 1 and 2. The following tables are as provided in Application Number 632967 to summarize the proposed changes at the applicable facilities.

BWP Equipment Addition

Table 5-2.1 BWP Equipment Addition

	Em	nission Unit		Contro	l Device		
Type of Equipment	Unit ID	Description	Throughput	Unit ID	Description		
		SIGNIFICANT UNITS					
	Process Group – Extrusion Line P6059						
Extrusion Line	P6059	PVC/Nylon Extruder (THHN)	1,300 lb/hr	N/A	N/A		
Hopper	P6060	Plastic Pellet Feed Hopper system	(PVC) 850 lb/hr	C6060	Dust Filters		
Ink Application System	P6061	Inkjet Printers (2)	(Nylon)	N/A	N/A		
Process Group Extrusion Line P6062							
Extrusion Line	P6062	PVC/Nylon Extruder (THHN)	1,300 lb/hr	N/A	N/A		
Hopper	P6063	Plastic Pellet Feed Hopper system	(PVC) 850 lb/hr (Nylon)	C6063	Dust Filters		
Ink Application System	P6064	Inkjet Printers (2)		N/A	N/A		
		Process Group – Extrusion Line	e P6065				
Extrusion Line	P6065	PVC/Nylon Extruder (THHN)		N/A	N/A		
Hopper	P6066	Plastic Pellet Feed Hopper system	1,300 lb/hr (PVC) 850 lb/hr	C6066	Dust Filters		
Ink Application System	P6067	Inkjet Printers (2)	(Nylon)	N/A	N/A		
		Process Group – Extrusion Line	e P6068				
Extrusion Line	P6068	PVC/Nylon Extruder (THHN)		N/A	N/A		
Hopper	P6069	Plastic Pellet Feed Hopper system	1,300 lb/hr (PVC) 850 lb/hr	C6069	Dust Filters		
Ink Application System	P6070	Inkjet Printers (2)	(Nylon)	N/A	N/A		
		Process Group – Extrusion Line	P6071				

	Emission Unit			Control Device		
Type of Equipment	Unit ID	Description	Throughput	Unit ID	Description	
Extrusion Line	P6071	PVC/Nylon Extruder (THHN)	1,300 lb/hr	N/A	N/A	
Hopper	P6072	Plastic Pellet Feed Hopper system	(PVC) 850 lb/hr	C6072	Dust Filters	
Ink Application System	P6073	Inkjet Printers (2)	(Nylon)	N/A	N/A	
	Process Group – Extrusion Line P6074					
Extrusion Line	P6074	PVC/Nylon Extruder (THHN)	1,300 lb/hr	N/A	N/A	
Hopper	P6075	Plastic Pellet Feed Hopper system	(PVC) 850 lb/hr	C6075	Dust Filters	
Ink Application System	P6076	Inkjet Printers (2)	(Nylon)	N/A	N/A	
Process Group – Extrusion Line P6077						
Extrusion Line	P6077	PVC (NM Line)		N/A	N/A	
Hopper	P6078	Plastic Pellet Feed Hopper system	3,000 lb/hr (PVC)	C6078	Dust Filters	
Ink Application System	P6079	Inkjet Printers (2)		N/A	N/A	
		Process Group – Extrusion Line	P6080			
Extrusion Line	P6080	PVC (NM Line)		N/A	N/A	
Hopper	P6081	Plastic Pellet Feed Hopper system	3,000 lb/hr (PVC)	C6081	Dust Filters	
Ink Application System	P6082	Inkjet Printers (2)		N/A	N/A	
		Process Group – Extrusion Line	P6083			
Extrusion Line	P6083	PVC (NM Line)		N/A	N/A	
Hopper	P6084	Plastic Pellet Feed Hopper system	3,000 lb/hr (PVC)	C6084	Dust Filters	
Ink Application System	P6085	Inkjet Printers (2)		N/A	N/A	
		Process Group – Extrusion Line	P6086			
Extrusion Line	P6086	PVC (NM Line)	3,000 lb/hr	N/A	N/A	

	Emission Unit			Control Device			
Type of Equipment	Unit ID	Description	Throughput	Unit ID	Description		
Hopper	P6087	Plastic Pellet Feed Hopper system	(PVC) 3,000 lb/hr	C6087	Dust Filters		
Ink Application System	P6088	Inkjet Printers (2)		N/A	N/A		
	Process Group – Extrusion Line P6089						
Extrusion Line	P6089	PVC (NM Line)		N/A	N/A		
Hopper	P6090	Plastic Pellet Feed Hopper system	3,000 lb/hr (PVC)	C6090	Dust Filters		
Ink Application System	P6091	Inkjet Printers (2)		N/A	N/A		
Process Group – Extrusion Line P6092							
Extrusion Line	P6092	PVC (NM Line)		N/A	N/A		
Hopper	P6093	Plastic Pellet Feed Hopper system	3,000 lb/hr (PVC)	C6093	Dust Filters		
Ink Application System	P6094	Inkjet Printers (2)		N/A	N/A		
		Process Group – Extrusion Line	P6095				
Extrusion Line	P6095	PVC (NM Line)		N/A	N/A		
Hopper	P6096	Plastic Pellet Feed Hopper system	3,000 lb/hr (PVC)	C6096	Dust Filters		
Ink Application System	P6097	Inkjet Printers (2)		N/A	N/A		
		Process Group – Extrusion Line	P6098				
Extrusion Line	P6098	PVC (NM Line)		N/A	N/A		
Hopper	P6099	Plastic Pellet Feed Hopper system	3,000 lb/hr (PVC)	C6099	Dust Filters		
Ink Application System	P6100	Inkjet Printers (2)		N/A	N/A		
Process Group – Extrusion Line P6101							
Extrusion Line	P6101	PVC (NM Line)	3,000 lb/hr	N/A	N/A		
Hopper	P6102	Plastic Pellet Feed Hopper	(PVC)	C6102	Dust Filters		

	Em	nission Unit		Control Device		
Type of Equipment	Unit ID	Description	Throughput	Unit ID	Description	
		system				
Ink Application System	P6103	Inkjet Printers (2)		N/A	N/A	
	Process Group – Extrusion Line P6104					
Extrusion Line	P6104	PVC (NM Line)		N/A	N/A	
Hopper	P6105	Plastic Pellet Feed Hopper system	3,000 lb/hr (PVC)	C6105	Dust Filters	
Ink Application System	P6106	Inkjet Printers (2)		N/A	N/A	
Process Group – Extrusion Line P6107						
Extrusion Line	P6107	PVC (NM Line)		N/A	N/A	
Hopper	P6108	Plastic Pellet Feed Hopper system	3,000 lb/hr (PVC)	C6108	Dust Filters	
Ink Application System	P6109	Inkjet Printers (2)		N/A	N/A	
		Process Group – Extrusion Line	P6110			
Extrusion Line	P6110	PVC (NM Line)		N/A	N/A	
Hopper	P6111	Plastic Pellet Feed Hopper system	3,000 lb/hr (PVC)	C6111	Dust Filters	
Ink Application System	P6112	Inkjet Printers (2)		N/A	N/A	
		Process Group – Extrusion Line	P6113			
Extrusion Line	P6113	PVC (NM Line)		N/A	N/A	
Hopper	P6114	Plastic Pellet Feed Hopper system	3,000 lb/hr (PVC)	C6114	Dust Filters	
Ink Application System	P6115	Inkjet Printers (2)		N/A	N/A	
Process Group – Extrusion Line P6116						
Extrusion Line	P6116	PVC (NM Line)	2 000 11- //-	N/A	N/A	
Hopper	P6117	Plastic Pellet Feed Hopper system	3,000 lb/hr (PVC)	C6117	Dust Filters	

	Emission Unit			Control Device			
Type of Equipment	Unit ID	Description	Throughput	Unit ID	Description		
Ink Application System	P6118	Inkjet Printers (2)		N/A	N/A		
		Process Group – Extrusion Line	P6119				
Extrusion Line	P6119	PVC (NM Line)		N/A	N/A		
Hopper	P6120	Plastic Pellet Feed Hopper system	3,000 lb/hr (PVC)	C6120	Dust Filters		
Ink Application System	P6121	Inkjet Printers (2)		N/A	N/A		
	Process Group – Extrusion Line P6122						
Extrusion Line	P6122	PVC (NM Line)		N/A	N/A		
Hopper	P6123	Plastic Pellet Feed Hopper system	3,000 lb/hr (PVC)	C6123	Dust Filters		
Ink Application System	P6124	Inkjet Printers (2)		N/A	N/A		
		Process Group – Extrusion Line	P6125				
Extrusion Line	P6125	PVC (NM Line)		N/A	N/A		
Hopper	P6126	Plastic Pellet Feed Hopper system	3,000 lb/hr (PVC)	C6126	Dust Filters		
Ink Application System	P6127	Inkjet Printers (2)		N/A	N/A		
	Pro	ocess group – Tandem Extrusion	Line P6128				
Extruder	P6128	PVC/Nylon Singlewire Cu Extruder w/annealer	1,300 lb/hr	N/A	N/A		
Hopper	P6129	Plastic Pellet Feed Hopper system	(PVC) 850 lb/hr	C6129	Dust Filters		
Ink Application System	P6130	Contact and Inkjet Printers (1 +2)	(Nylon)	N/A	N/A		
Drawing Machine	P6131	Single Cu Annealer Drawing Machine	6,250 lb/hr	N/A	N/A		
	Pro	ocess Group – Tandem Extrusion	Line P6132				
Extruder	P6132	PVC/Nylon Singlewire Cu	1,300 lb/hr	N/A	N/A		

	Emission Unit				
Type of Equipment	Unit ID	Description	Throughput	Unit ID	Description
		Extruder w/annealer	(PVC)		
Hopper	P6133	Plastic Pellet Feed Hopper system	850 lb/hr (Nylon)	C6133	Dust Filters
Ink Application System	P6134	Contact and Inkjet Printers (1 +2)		N/A	N/A
Drawing Machine	P6135	Single Cu Annealer Drawing Machine	6,250 lb/hr	N/A	N/A
		Miscellaneous			
Silos	P6138	Product Silo	15,000 lb/hr	C6138	Bin Vent Filter
Silos	P6139	Product Silo	15,000 lb/hr	C6139	Bin Vent Filter
Silos	P6140	Product Silo	15,000 lb/hr	C6140	Bin Vent Filter
Silos	P6141	Product Silo	15,000 lb/hr	C6141	Bin Vent Filter
Drawing Machine	P6142	Cu Dual Drawing Machine	12,500 lb/hr	N/A	N/A
Drawing Machine	P6143	Cu Dual Drawing Machine	12,500 lb/hr	N/A	N/A
Drawing Machine	P6144	Cu Dual Drawing Machine	12,500 lb/hr	N/A	N/A
Drawing Machine	P6145	Cu Dual Drawing Machine	12,500 lb/hr	N/A	N/A
Ink Application System	P6146	Floater Printer	250 gal/yr	N/A	N/A
Ink Application System	P6147	Floater Printer	250 gal/yr	N/A	N/A
		INSIGNIFICANT UNITS			
Cooling Tower	СТ3	Cooling Tower	1,657 gal/min	N/A	N/A
Cooling Tower	CT4	Cooling Tower	1,657 gal/min	N/A	N/A
Cooling Tower	CT5	Cooling Tower	1,657 gal/min	N/A	N/A
Cooling Tower	СТ6	Cooling Tower	1,657 gal/min	N/A	N/A
Cooling Tower	СТ7	Cooling Tower	1,657 gal/min	N/A	N/A
Cooling Tower	СТ8	Cooling Tower	1,657 gal/min	N/A	N/A

Emission Unit					l Device
Type of Equipment	Unit ID	Description	Throughput	Unit ID	Description
Cooling Tower	СТ9	Cooling Tower	1,657 gal/min	N/A	N/A
Cooling Tower	CT10	Cooling Tower	1,657 gal/min	N/A	N/A
Cooling Tower	CT11	Cooling Tower	1,657 gal/min	N/A	N/A
Cooling Tower	CT12	Cooling Tower	1,657 gal/min	N/A	N/A
Cooling Tower	CT13	Cooling Tower	1,657 gal/min	N/A	N/A

BWP Equipment Removal

Table 5-2.2 BWP Equipment Removal

	Emission Units			rol Device	Estimated
Type of Equipment	Unit ID	Description	Unit ID	Description	Removal Date
		Process Group – Extrusion Line	730-03		
Extruder	P692	Extruder 730-03	N/A	N/A	
Hopper	H692	Plastic Pellet Hopper System	C692	Dust Filter	Romoved
Ink Application System	1692	Ink Application System	N/A	N/A	- Removed
		Miscellaneous			
Cooling Tower	CT1	Cooling Tower 3063-70	N/A	N/A	Q4 2022
Cooling Tower	CT2	Cooling Tower 3063-71	N/A	N/A	Q4 2022
Drawing Machine	P226 (420-04)	Drawing Machine	N/A	N/A	Removed

MC Equipment Addition

Table 5-3.1 MC Equipment Addition

Emission Unit				Control Device	
Description	escription Unit ID Description Throughput			Unit ID	Description
		SIGNIFICANT UNITS			
		Armoring Lines			
Armoring Lines	P3027 thru P3036	Single Strip Armoring Machine	1.8 gal/day	N/A	N/A

Emission Unit				Control Device		
Description	Unit ID	Description	Throughput	Unit ID	Description	
Armoring Line Printers	P3040 thru P3052	Printers	250 gal/yr	N/A	N/A	
INSIGNIFICANT UNITS						
None were installed						

MC Equipment Removal

No Equipment are removed.

CRM Equipment Addition

Table 5-4.1 CRM Equipment Addition

	Emission Unit				Device
Description	Unit ID	Description	Throughput	Unit ID	Description
		SIGNIFICANT UNITS			
Storage Tank	ST1	IPA Tank	8,000 gal	N/A	N/A
Combustion	P480	Q800V Propane Vaporizer System	0.08 MMBtu/hr	N/A	N/A
Combustion	P481	Q800V Propane Vaporizer System	0.08 MMBtu/hr	N/A	N/A
		INSIGNIFICANT UNI	тs		
Storage Tank	ST2	550-gal Lube Oil Tank	550 gal	N/A	N/A
Storage Tank	ST3	550-gal Lube Oil Tank	550 gal	N/A	N/A
Storage Tank	ST4	550-gal Used Oil Tank	550 gal	N/A	N/A
Storage Tank	ST5	15,000 gal Used Oil Tank	15,000 gal	N/A	N/A
Cooling Tower	CT14	Process Water System Cooling Tower	4,845 gpm	N/A	N/A
Cooling Tower	CT15	Process Water System Cooling Tower	4,845 gpm	N/A	N/A

	Control Device				
Description	Unit ID	Description	Throughput	Unit ID	Description
Cooling Tower	CT16	Process Water System Cooling Tower	4,845 gpm	N/A	N/A
Cooling Tower	CT17	Cast Water System Cooling Tower	2,550 gpm	N/A	N/A
Cooling Tower	CT18	Cast Water System Cooling Tower	2,550 gpm	N/A	N/A

CRM Equipment Removal

Table 5-4.2 CRM Equipment Removal

Emission Units			Contro	Estimated	
Type of Equipment	Unit ID	Description	Unit ID	Description	Removal Date
		Miscellaneo	us		
Drawing Machine	P477	Cu Drawing Machine with Annealer	N/A	N/A	Never Installed
Drawing Machine	P478	Cu Drawing Machine with Annealer	C478	N/A	Never Installed
Vertical Rod	F476	Electric Induction Vertirod Copper Rod Production Unit	N/A	N/A	Never Installed

UPP Equipment Addition

Table 5-5.1 UPP Equipment Addition

Emission Unit				Control Device			
Description	Unit ID	Description	Unit ID	Description			
SIGNIFICANT UNITS							
Process group – Extrusion Line P7069							
Extruder	P7069	XLPE, Poly, XHHW Extruder		N/A	N/A		
Hopper	P7070	Plastic Pellet Hopper System	2,470 lb/hr	C7070	Dust Collector		
Ink Application System	P7071	Inkjet Printers (2)		N/A	N/A		

Emission Unit			Control I	Device	
Description	Unit ID	Description	Throughput	Unit ID	Description
		Process group – Extrusion	on Line P7072		
Extruder	P7072	XLPE, Poly, XHHW Extruder		N/A	N/A
Hopper	P7073	Plastic Pellet Hopper System	2,470 lb/hr	C7073	Dust Collector
Ink Application System	P7074	Inkjet Printers (2)		N/A	N/A
		Miscellaneou	IS		
Ink Application system	P7029	Floater Printer	96 gal/yr	N/A	N/A
Ink Application system	P7030	Floater Printer	96 gal/yr	N/A	N/A
Ink Application system	P7031	Floater Printer	96 gal/yr	N/A	N/A
Ink Application system	P7032	Floater Printer	96 gal/yr	N/A	N/A
Ink Application system	P7033	Floater Printer	96 gal/yr	N/A	N/A
Ink Application system	P7034	Floater Printer	96 gal/yr	N/A	N/A
Ink Application system	P7035	Floater Printer	96 gal/yr	N/A	N/A
Ink Application system	P7036	Floater Printer	96 gal/yr	N/A	N/A
Ink Application system	P7037	Floater Printer	96 gal/yr	N/A	N/A
Ink Application system	P7038	Floater Printer	96 gal/yr	N/A	N/A
Ink Application system	P7039	Floater Printer	96 gal/yr	N/A	N/A
Ink Application system	P7040	Floater Printer	96 gal/yr	N/A	N/A
Ink Application system	P7041	Floater Printer	96 gal/yr	N/A	N/A
Ink Application system	P7042	Floater Printer	96 gal/yr	N/A	N/A
Ink Application system	P7043	Floater Printer	96 gal/yr	N/A	N/A
Ink Application system	P7044	Floater Printer	96 gal/yr	N/A	N/A
Ink Application system	P7045	Floater Printer	96 gal/yr	N/A	N/A
Ink Application system	P7046	Floater Printer	96 gal/yr	N/A	N/A

Emission Unit			Control I	Device	
Description	Unit ID	Description	Throughput	Unit ID	Description
Ink Application system	P7047	Floater Printer	96 gal/yr	N/A	N/A
Ink Application system	P7048	Floater Printer	96 gal/yr	N/A	N/A
Ink Application system	P7049	Floater Printer	96 gal/yr	N/A	N/A
Ink Application system	P7050	Floater Printer	96 gal/yr	N/A	N/A
Ink Application system	P7051	Floater Printer	96 gal/yr	N/A	N/A
Drawing Machine	P7052	Al Dual Drawing Machine	10,101 lb/hr	C7052	Oil Mist Collector
Drawing Machine	P7053	Al/Cu Dual Drawing Machine	10,101 lb/hr	C7053	Oil Mist Collector
Drawing Machine	P7054	Al Dual Drawing Machine	10,101 lb/hr	C7054	Oil Mist Collector
Drawing Machine	P7055	Al Single Drawing Machine	8,640 lb/hr	C7055	Oil Mist Collector
Drawing Machine	P7056	Al/Cu Single Drawing Machine	8,640 lb/hr	C7056	Oil Mist Collector
Generator	P7057	9.98 MMBtu/hr NG Steam Generator	9.98 MMBtu/hr	N/A	N/A
Generator	P7058	9.98 MMBtu/hr NG Steam Generator	9.98 MMBtu/hr	N/A	N/A
Humidifiers	P7059	0.996 MMBtu/hr humidifier	0.996 MMBtu/hr	N/A	N/A
Humidifiers	P7060	0.996 MMBtu/hr humidifier	0.996 MMBtu/hr	N/A	N/A
Humidifiers	P7061	0.996 MMBtu/hr humidifier	0.996 MMBtu/hr	N/A	N/A
Humidifiers	P7062	0.996 MMBtu/hr humidifier	0.996 MMBtu/hr	N/A	N/A
Humidifiers	P7063	0.996 MMBtu/hr humidifier	0.996 MMBtu/hr	N/A	N/A
Humidifiers	P7064	0.996 MMBtu/hr humidifier	0.996 MMBtu/hr	N/A	N/A
Humidifiers	P7065	0.996 MMBtu/hr humidifier	0.996 MMBtu/hr	N/A	N/A
Humidifiers	P7066	0.996 MMBtu/hr humidifier	0.996 MMBtu/hr	N/A	N/A

	Control D	Device			
Description	Unit ID	Description	Throughput	Unit ID	Description
Humidifiers	P7067	0.996 MMBtu/hr humidifier	0.996 MMBtu/hr	N/A	N/A
Humidifiers	P7068	0.996 MMBtu/hr humidifier	0.996 MMBtu/hr	N/A	N/A

INSIGNIFICANT UNITS

None were installed

UPP Equipment Removal

Table 5-5.2 UPP Equipment Removal

Emission Units		Control Device		Estimated	
Type of Equipment	Unit ID	Description	Unit ID	Description	Removal Date
		Process Group – Extrusion Line 7	50-05		
Extruder	P250	Extruder 750-05	N/A	N/A	
Hopper	H250	Plastic Pellet Hopper System	N/A	N/A	Q4 2023
Ink Application System	P251	Ink Application System	N/A	N/A	
		Process Group – Extrusion Line 7	40-02		
Extruder	P262	Extruder 740-02	N/A	N/A	
Hopper	H262	Plastic Pellet Hopper System	N/A	N/A	Q3 2023
Ink Application System	P263	Ink Application System	N/A	N/A	
		Miscellaneous			
Drawing Machine	P744	Drawing Machine with	C744	Oil Mist	Q3 2023
Drawing Machine	F 7 4 4	Annealer 450-05	C/44	Collector	Q3 2023
Drawing Machine	P778	Drawing Machine with	N/A	N/A	Removed
Drawing Machine	F770	Annealer	IN/A	IN/A	Kemoved
Oven	CS6	1.5 MMBtu/hr Preheat Oven	N/A	N/A	Removed
Oven	<u> </u>	3059-14	IN/A	N/A	Kemoved
Drawing Machine	P223	Single Wire Drawing	N/A	N/A	Removed
Drawing Machine	1 223	Machine w/ annealer	IN/A	N/A	Kemoved
Drawing Machine	P220	Single Wire Drawing	N/A	N/A	Removed
Drawing Machine	1 220	Machine w/ annealer	II/A	N/A	Kemoved
Drawing Machine	P221	Single Wire Drawing	N/A	N/A	Removed
Drawing Machine	1 221	Machine w/o annealer	II/A	N/A	Kemoved
Drawing Machine	P227	Single Wire Drawing	N/A	N/A	Removed
Drawing Machine	1 441	Machine w/ annealer	14/7	IV/A	nemoved
Drawing Machine	P225	Drawing Machine	N/A	N/A	Removed
Drawing Machine	P226	Drawing Machine	N/A	N/A	Removed

CTC Equipment Added

Table 5-6.1 CTC Equipment Addition

Emission Unit	Control Device
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Type of Equipment	Unit ID	Description	Throughput	Unit ID	Description		
	SIGNIFICANT UNITS						
		None were inst	alled				
		INSIGNIFICANT I	JNITS				
		Miscellaneo	ıs				
Generator	P825	4.1 kW Diesel-Fired Portable Generator	4.1 kW	N/A	N/A		
Generator	P826	11.5 kW High Temperature Furnace	11.5 kW	N/A	N/A		
Testing Equipment	N/A	Dump Extruder	150 lb/hr	N/A	N/A		
Testing Equipment	N/A	CV Line Electric Steam Boiler	10 hp	N/A	N/A		
Testing Equipment	N/A	TCO-1 Midsize Oil Temperature Control Unit 460/3/60	1 hp	N/A	N/A		
Testing Equipment	N/A	TCO-C Compact Oil Temperature Control Unit 460/3/60	0.75 hp	N/A	N/A		
Testing Equipment	N/A	Thermogravimetric analyzer	-	N/A	N/A		
Testing Equipment	N/A	Thermomechanical analyzer	-	N/A	N/A		
Testing Equipment	N/A	Differential Scanning Calorimeter	-	N/A	N/A		
Testing Equipment	N/A	Autoclave	-	N/A	N/A		
Testing Equipment	N/A	Toxicity Chamber	-	N/A	N/A		
Testing Equipment	N/A	Melt Flow Index	-	N/A	N/A		
Testing Equipment	N/A	Limiting Oxygen Index tester	-	N/A	N/A		
Testing Equipment	N/A	Environmental Chamber	-	N/A	N/A		

	Control Device				
Type of Equipment	Unit ID	Description	Throughput	Unit ID	Description
Testing Equipment	N/A	FT5 Burn Chamber	-	N/A	N/A
Testing Equipment	N/A	Small Scale Flame Chamber	-	N/A	N/A
Testing Equipment	N/A	Ozone Chamber	-	N/A	N/A
Testing Equipment	N/A	Smoke Density Chamber	-	N/A	N/A
Testing Equipment	N/A	Dust Test Chamber	-	N/A	N/A
Testing Equipment	N/A	Hot Oil Heated Mill Rolls	7.5 hp	N/A	N/A
Testing Equipment	N/A	Cu/Al Single Die Drawing Machine with no annealer	10 lb/hr	N/A	N/A
Testing Equipment	N/A	CNC Machine	-	N/A	N/A
Testing Equipment	N/A	Aluminum Extrusion Press	-	N/A	N/A
Testing Equipment	N/A	Induction Furnace	-	N/A	N/A
Testing Equipment	N/A	Optical Emission Spectrometer	-	N/A	N/A
Testing Equipment	N/A	Instron SF16 Furnace	-	N/A	N/A
Testing Equipment	N/A	Twin Screw Extruder	50 lb/hr	N/A	N/A
Testing Equipment	N/A	Twin Screw Extruder	15 lb/hr	N/A	N/A
Testing Equipment	N/A	Single Screw Extruder Lab 4	30 lb/hr	N/A	N/A
Testing Equipment	N/A	Buss Kneader	120 lb/hr	N/A	N/A
Testing Equipment	N/A	Weigh Station	150 lb/hr	N/A	N/A
Testing Equipment	N/A	Handheld Propane Torch	-	N/A	N/A
Testing Equipment	N/A	Microcalorimeter	20 mg/hr	N/A	N/A
Testing Equipment	N/A	Rubber Process Analyzer	40 mg/hr	N/A	N/A
Testing Equipment	N/A	Injection Molder	5 g	N/A	N/A

	Emission Unit				
Type of Equipment	Unit ID	Description	Throughput	Unit ID	Description
Testing Equipment	N/A	Hydraulic Press	3 lb/hr	N/A	N/A
Testing Equipment	N/A	Hydraulic Press	3 lb/hr	N/A	N/A
Testing Equipment	N/A	Haake Mixer	6 lb/hr	N/A	N/A
Testing Equipment	N/A	Brabender Prep Mixer	6 lb/hr	N/A	N/A
Testing Equipment	N/A	High Intensity Mixer	160 lb/hr	N/A	N/A
Testing Equipment	N/A	High Intensity Mixer	150 lb/hr	N/A	N/A
Testing Equipment	N/A	High Intensity Mixer	35 lb/hr	N/A	N/A
Testing Equipment	N/A	Intermesh Mixer	150 lb/hr	N/A	N/A
Testing Equipment	N/A	Banbury Mixer	15 lb/hr	N/A	N/A
Testing Equipment	N/A	Heat Deflection Tester	-	N/A	N/A

CTC Equipment Removed

Table 5-6.2 CTC Equipment Removal

	Emission Units			Control Device		
Type of Equipment	Unit ID	Description	Unit ID	Description	Removal Date	
Chamber	P913	French Flame Chamber	C040 C042	C910 - Flat bed HEAF fabric filter/mist	Removed	
Temperature Measurement	P912	Cone Calorimeter	C910 or C912	eliminator C912 – Dual Scrubber	Removed	
Boiler	P911	0.42 MMBtu/hr Propane-Fired Boiler	N/A	N/A	Q4 2022	
N/A	N/A	Photo Developing Equipment	N/A	N/A	Removed	

CEM Equipment Addition

Emission Unit				Control D	Device
Description Unit ID Description Throughput				Unit ID	Description
SIGNIFICANT UNITS					
Generator	P824	35 kW Diesel-Fired Emergency Generator	35 kW	N/A	N/A

CEM Equipment Removal

Emission Units			Control	Estimated	
Type of Equipment	Unit ID	Description	Unit ID	Description	Removal Date
Generators	P804	Waukesha Generator	N/A	N/A	Removed
Generators	P805	Waukesha Generator	N/A	N/A	Removed
Generators	P806	Waukesha Generator	N/A	N/A	Removed

TAP Equipment Added

No new equipment is added.

TAP Equipment Removal

Table 5-8.2 TAP Equipment Removed

Emission Units			Con	trol Device	Estimated Removal	
Type of Equipment	Unit ID	Description	Unit ID Description		Date	
Painting	P970	Blade Coating	N/A	N/A	Removed	

Other Changes

Table 5-9. Miscellaneous Changes

Location	Source	Changes				
BWP	Section 3	P115 description is changed from 740-18 to 750-55				
		The original permit has two scenarios permitted for certain equipment				
СТС	Various	located at CTC. Southwire has decided to operate only scenario 1 at all				
CIC	Various	times. Therefore, all conditions related to scenario 2 will be removed. Each				
		individual condition is separately addressed in section 5.6 of the narrative.				
N/A	Insig	Medical Center Generator is incorrectly labelled as P820. This should be				
IN/A	IIISIB	P823.				
BWP	Insig	BWP PVC Cold Mixer (PVC C2-02 is listed twice and one of them should be				
DVVP	IIISIB	PVC C1-02).				
lacia lacia		For all other equipment modifications in the Insignificant Activity, please				
Insig	Insig	refer to Application Number 632967.				

B. Equipment List for the Process

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

Southwire's Carrollton main campus consists of eight distinct entities. Therefore, Parts 3.0 through 6.0 of this Permit have been separated into nine sections and an alphabetic character has been added to each Permit Condition number to indicate which entity is subject to that Part or Condition. The alphabetic characters have been assigned as follows:

- A Campus-wide or multi-facility [MULTI]
- B Building Wire Plant [BWP]
- C MC Plant [MC]
- D Copper Rod Mill [CRM]
- E Utility Products Plant [UPP]
- F Machine Services Group [MSG]
- G Cofer Technology Center [CTC]
- H Corporate Energy Management [CEM]
- I Tools and Assembled Products [TAP]

The following is an explanation of text types used in Table 3.1.3 – Additional Emission Units:

- Equipment that appears in strikethrough text has been removed from the facility or was never installed at the facility.
- Equipment that appears in underline text are proposed modifications as included in this permit application modification.
- Equipment that appears in italics text are equipment that will be removed from the facility in the future.
- Equipment that appears in bold texts are equipment that were added as part of the Modernization 1 Phase.
- Equipment that appears in a combination of underline and bold texts are equipment that were to be added as part of the Modernization 1 Phase and were included in the initial application/calculations. However, they were not added to Title V Operating Permit Amendment Number 3357-045-0008-V-05-2 at the time.

3.1.3 Additional Emission Units

	Emission Units	Applicable	A	ir Pollution Control Devices
ID No.	Description	Requirements/Standards	ID No.	Description
Buildin	g Wire Plant (B)			
	• • • • • • • • • • • • • • • • • • • •	Process Group Extrusion Line	e 730	
		391-3-102(2)(e)		
P692	Extruders 730-03	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
H692	Plastic Pellet Feed Hopper	391-3-102(2)(e)	C692	Dust Filters
	System	391-3-102(2)(b)		
		391-3-102(2)(e)		
1692	Ink Application System	391 3 1 .02(2)(b)	None	NA
		391-3-102(2)(tt) Miscellaneous		<u> </u>
CT1	Cooling Tower 3063-70	391-3-102(2)(e)	None	<u>NA</u>
		<u>391-3-102(2)(b)</u>		_
CT2	Cooling Tower 3063-71	<u>391-3-102(2)(e)</u>	<u>None</u>	NA.
<u>C12</u>	Cooling Tower 3003-71	<u>391-3-102(2)(b)</u>		IVA
		Process Group – Extrusion Line	P6059	
D < 0.50		391-3-102(2)(e)		
P6059	<u>Extruders</u>	391-3-102(2)(b)	<u>None</u>	<u>NA</u>
	Plastic Pellet Feed Hopper	391-3-102(2)(tt) 391-3-102(2)(e)		
<u>P6060</u>	System	391-3-102(2)(b)	<u>C6060</u>	<u>Dust Filters</u>
	Bystem	391-3-102(2)(e)		
P6061	Ink Application System	391-3-102(2)(b)	None	<u>NA</u>
		391-3-102(2)(tt)		
		<u>Process Group – Extrusion Line</u>	P6062	
		391-3-102(2)(e)		
P6062	<u>Extruders</u>	391-3-102(2)(b)	None None	<u>NA</u>
		391-3-102(2)(tt)		
P6063	Plastic Pellet Feed Hopper	391-3-102(2)(e)	C6063	<u>Dust Filters</u>
	<u>System</u>	391-3-102(2)(b) 391-3-102(2)(e)		
P6064	Ink Application System	391-3-102(2)(b)	None	NA
10001	ink rippireuron system	391-3-102(2)(tt)	Ttone	1111
		Process Group – Extrusion Line	P6065	
		391-3-102(2)(e)		
P6065	<u>Extruders</u>	391-3-102(2)(b)	None None	<u>NA</u>
		391-3-102(2)(tt)		
P6066	Plastic Pellet Feed Hopper	391-3-102(2)(e)	C6066	Dust Filters
	<u>System</u>	391-3-102(2)(b)	1	
P6067	Ink Application System	391-3-102(2)(e) 391-3-102(2)(b)	None	<u>NA</u>
10007	ink Application System	391-3-102(2)(tt)	None	INA
		Process Group – Extrusion Line	P6068	
		391-3-102(2)(e)	1 0000	
P6068	Extruders	391-3-102(2)(b)	None	<u>NA</u>
_ 0000		<u>391-3-102(2)(tt)</u>		_
P6069	<u>Plastic Pellet Feed Hopper</u>	<u>391-3-102(2)(e)</u>	C6069	<u>Dust Filters</u>
	<u>System</u>	391-3-102(2)(b)	1	
	T-1 A1' C	391-3-102(2)(e)		774
P6070	Ink Application System	391-3-102(2)(b) 301-3-102(2)(tt)	<u>None</u>	NA
		391-3-102(2)(tt) Process Group – Extrusion Line	P6071	1
		391-3-102(2)(e)	100/1	
D6071	<u>Extruders</u>	391-3-102(2)(b)	None	<u>NA</u>
P6071		391-3-102(2)(tt)	1,0110	

	Emission Units	Applicable	Δi	r Pollution Control Devices	
ID No.	Description	Requirements/Standards	ID No.	Description	
P6072	Plastic Pellet Feed Hopper	391-3-102(2)(e)	C6072	Dust Filters	
10072	System	391-3-102(2)(b)	20072	<u>Bust 1 mers</u>	
		391-3-102(2)(e)			
P6073	Ink Application System	391-3-102(2)(b)	None	<u>NA</u>	
10075	<u> </u>	391-3-102(2)(tt)			
		Process Group – Extrusion Line	P6074		
		<u>391-3-102(2)(e)</u>			
P6074	<u>Extruders</u>	<u>391-3-102(2)(b)</u>	None	<u>NA</u>	
		<u>391-3-102(2)(tt)</u>			
P6075	Plastic Pellet Feed Hopper	<u>391-3-102(2)(e)</u>	<u>C6075</u>	<u>Dust Filters</u>	
	System	391-3-102(2)(b)			
		<u>391-3-102(2)(e)</u>			
<u>P6076</u>	Ink Application System	391-3-102(2)(b)	None	<u>NA</u>	
		391-3-102(2)(tt)	DC077		
	1	Process Group – Extrusion Line	P6077	T	
	Extendore	391-3-102(2)(e) 391-3-102(2)(b)	Ni	NIA	
<u>P6077</u>	<u>Extruders</u>	391-3-102(2)(tt)	<u>None</u>	<u>NA</u>	
P6078	Plastic Pellet Feed Hopper	391-3-102(2)(e)	<u>C6078</u>	Dust Filters	
10078	System	391-3-102(2)(b)	20070	<u>Dust I mers</u>	
	<u>5 ystem</u>	391-3-102(2)(e)			
P6079	Ink Application System	391-3-102(2)(b)	None	<u>NA</u>	
<u>F0079</u>		391-3-102(2)(tt)	1,0110		
		Process Group – Extrusion Line	P6080		
		391-3-102(2)(e)			
P6080	<u>Extruders</u>	391-3-102(2)(b)	None	<u>NA</u>	
10000		391-3-102(2)(tt)			
P6081	Plastic Pellet Feed Hopper	<u>391-3-102(2)(e)</u>	C6081	<u>Dust Filters</u>	
	System	<u>391-3-102(2)(b)</u>			
		<u>391-3-102(2)(e)</u>			
P6082	Ink Application System	391-3-102(2)(b)	<u>None</u>	<u>NA</u>	
		391-3-102(2)(tt)	DC002		
	1	Process Group – Extrusion Line 391-3-102(2)(e)	P0083	1	
DC002	<u>Extruders</u>	391-3-102(2)(b)	None	NA	
<u>P6083</u>	Extruders	391-3-102(2)(tt)	<u>None</u>	<u>NA</u>	
P6084	Plastic Pellet Feed Hopper	391-3-102(2)(e)	<u>C6084</u>	Dust Filters	
10004	System	391-3-102(2)(b)	<u>2000 I</u>	<u>Bust 1 mers</u>	
		391-3-102(2)(e)			
P6085	Ink Application System	391-3-102(2)(b)	None	<u>NA</u>	
10005		391-3-102(2)(tt)			
		<u>Process Group – Extrusion Line</u>	P6086		
		<u>391-3-102(2)(e)</u>			
<u>P6086</u>	<u>Extruders</u>	<u>391-3-102(2)(b)</u>	None	<u>NA</u>	
		391-3-102(2)(tt)			
<u>P6087</u>	Plastic Pellet Feed Hopper	391-3-102(2)(e)	<u>C6087</u>	<u>Dust Filters</u>	
	System	391-3-102(2)(b)			
D6000	Ink Application System	391-3-102(2)(e) 391-3-102(2)(b)	None	NI A	
<u>P6088</u>	Ink Application System	391-3-102(2)(tt) 391-3-102(2)(tt)	None	<u>NA</u>	
Process Group – Extrusion Line P6089					
		391-3-102(2)(e)	1 0002		
P6089	<u>Extruders</u>	391-3-102(2)(b)	None	<u>NA</u>	
10007	2/11/10015	391-3-102(2)(tt)	110110	-111	
P6090	Plastic Pellet Feed Hopper	391-3-102(2)(e)	C6090	Dust Filters	
10000	System	391-3-102(2)(b)	22270		
	-	391-3-102(2)(e)			
P6091	Ink Application System	391-3-102(2)(b)	None	<u>NA</u>	
		391-3-102(2)(tt)			
		<u>Process Group – Extrusion Line</u>	P6092	<u></u>	

DNO. Description Requirements/Standards DNO. Description Security Security	Emission Units		Applicable	Air Pollution Control Devices			
P6092 Extruders	ID No						
P6092	ть но.	Description		10 110.	Description		
Pastic Pellet Feed Hopper System	P6092	Extruders		None	NA		
P6094	10072			Tione			
Process Proc	P6093	Plastic Pellet Feed Hopper	391-3-102(2)(e)	C6093	<u>Dust Filters</u>		
P6094		<u>System</u>	<u>391-3-102(2)(b)</u>				
P6095							
Process Group - Extrusion Line P6095 Saturders 391.31-102(2)th None NA	<u>P6094</u>	Ink Application System		None	NA NA		
P6095 Extruders 391-31-1-02(2)(th) None NA				Dc005			
P6095 Extruders 391-31-1-02/20th None NA				P6095	T		
P6096 Plastic Pellet Feed Hopper System 391-31-1-02(2)(tb) System 391-31-1-02(2)(tb) System 391-31-1-02(2)(tb) System System 391-31-1-02(2)(tb) System System	D6005	Extrudors		None	NI A		
P6096	<u>F0093</u>	Extruders		None	INA INA		
P6097	P6096	Plastic Pellet Feed Hopper		C6096	Dust Filters		
P6097	10070			20070	<u>Bust Titters</u>		
Process Group - Extrusion Line P6098 391-31-1.02(2)(t) None NA 391-31-1.02(2)(t) None NA System 391-31-1.02(2)(t) None NA System 391-31-1.02(2)(t) None NA System System 391-31-1.02(2)(t) None NA System System 391-31-1.02(2)(t) None NA System Syst							
Process Group - Extrusion Line P6098 391-31-1.02(2)(t) None NA 391-31-1.02(2)(t) None NA System 391-31-1.02(2)(t) None NA System 391-31-1.02(2)(t) None NA System System 391-31-1.02(2)(t) None NA System System 391-31-1.02(2)(t) None NA System Syst	P6097	Ink Application System	391-3-102(2)(b)	None	<u>NA</u>		
P6098 Extruders 391-3102(2)(b) 391-3102			<u>391-3-102(2)(tt)</u>				
P6098			<u>Process Group – Extrusion Line</u>	P6098			
P6099 Plastic Pellet Feed Hopper 391-31-02(2)(tc) C6099 Dust Filters System 391-31-02(2)(tc)			391-3-102(2)(e)				
Percent Perc	<u>P6098</u>	<u>Extruders</u>		<u>None</u>	<u>NA</u>		
Post							
P6100	P6099			<u>C6099</u>	<u>Dust Filters</u>		
P6100		System					
Process Group - Extrusion Line P6101	D6100	Inla Application System		None	NT A		
Process Group	<u>P0100</u>	IIIK Application System		None	NA NA		
P6101 Extruders 391-3-102(2)(t) None NA P6102 Plastic Pellet Feed Hopper System 391-3-102(2)(t) 391-3-102(2)(t) P6103 Ink Application System 391-3-102(2)(t) 391-3-102(2)(t) None NA P6104 Extruders 391-3-102(2)(t) None NA P6105 Plastic Pellet Feed Hopper System 391-3-102(2)(t) None NA P6106 Ink Application System 391-3-102(2)(t) None NA P6107 Extruders 391-3-102(2)(t) None NA P6108 Plastic Pellet Feed Hopper System 391-3-102(2)(t) None NA P6109 Ink Application System 391-3-102(2)(t) None NA P6110 Extruders 391-3-102(2)(t) None NA P6111 Plastic Pellet Feed Hopper 391				26101	L		
P6101							
P6102 Plastic Pellet Feed Hopper 391-3-102(2)(tb) System 391-3-102(2)(b) System 391-3-102(2)(b) System 391-3-102(2)(b) System System 391-3-102(2)(b) System	P6101	Extruders		None	<u>NA</u>		
P6103			391-3-102(2)(tt)				
P6103	P6102	Plastic Pellet Feed Hopper		<u>C6102</u>	<u>Dust Filters</u>		
P6103		System					
Process Group - Extrusion Line P6104 System System							
Process Group - Extrusion Line P6104 391-3-102(2)(e) 391-3-102(2)(b) 391-3	P6103	Ink Application System		<u>None</u>	NA NA		
P6104 Extruders 391-3-102(2)(b) None NA P6105 Plastic Pellet Feed Hopper System 391-3-102(2)(b) 391-3-102(2)(b) P6106 Ink Application System 391-3-102(2)(b) None NA P6107 Extruders 391-3-102(2)(b) 391-3-102(2)(b) P6108 Plastic Pellet Feed Hopper System 391-3-102(2)(b) None NA P6109 Ink Application System 391-3-102(2)(b) None NA P6109 Ink Application System 391-3-102(2)(b) None NA P6109 Ink Application System 391-3-102(2)(b) None NA P6110 Extruders 391-3-102(2)(b) None NA P6111 Plastic Pellet Feed Hopper 391-3-102(2)(b) None NA P6111 Plastic Pellet Feed Hopper 391-3-102(2)(c) None NA P6111 Plastic Pellet Feed Hopper 391-3-102(2)(c) None NA P6111 Plastic Pellet Feed Hopper 391-3-102(2)(c) C6111 Dust Filters P0110 Dust Filters NA P0110 Extruders 391-3-102(2)(c) None NA P0111 Plastic Pellet Feed Hopper 391-3-102(2)(c) C6111 Dust Filters P0110 Dust Filters Dust Filters P0110 P0111 Plastic Pellet Feed Hopper 391-3-102(2)(c) C6111 Dust Filters P0110 Dust Filters Dust Filters P0110 P0111 P1111 P11111 P1111 P1111 P1111 P11111 P111111 P11111 P11111 P11111 P11111 P11111 P111111 P111111 P111111 P111111 P111111 P1111111 P1111111 P1111111 P11111111				DC104			
P6104 Extruders 391-3-102(2)(b) 391-3-102(2)(c) 26105 Dust Filters P6105 Plastic Pellet Feed Hopper System 391-3-102(2)(b) 391-3-102(2)(b) P6106 Ink Application System 391-3-102(2)(b) 391-3-102(2)(b) None NA P6107 Extruders 391-3-102(2)(b) None NA P6108 Plastic Pellet Feed Hopper System 391-3-102(2)(b) 391-3-102(2)(b) None NA P6109 Ink Application System 391-3-102(2)(b) System 391-3-102(2)(b) None NA P6109 Ink Application System 391-3-102(2)(b) System 391-3-102(2)(b) None NA P6110 Extruders 391-3-102(2)(b) System 391-3-102(2)(b) None NA P6110 Extruders 391-3-102(2)(b) None NA P6111 Plastic Pellet Feed Hopper 391-3-102(2)(c) C6111 Dust Filters		1		P0104	T		
P6105 Plastic Pellet Feed Hopper System 391-3-102(2)(e)	D6104	Extrudors		None	NA.		
P6105 Plastic Pellet Feed Hopper System 391-3-102(2)(e) 391-3-102(2)(e) 391-3-102(2)(e) 391-3-102(2)(e) 391-3-102(2)(e) 391-3-102(2)(t) None NA	<u>F0104</u>	Extruders		None	INA INA		
Poince System 391-3-102(2)(b) 391-3-102(2)(c) 391-3-102(2)(b) 391-3-102(2)(b) 391-3-102(2)(b) 391-3-102(2)(tt) Poince Process Group - Extrusion Line P6107 Poince Struders 391-3-102(2)(b) None NA Poince	P6105	Plastic Pellet Feed Hopper		C6105	Dust Filters		
P6106	10105			20100	<u> </u>		
Process Group - Extrusion Line P6107							
Process Group - Extrusion Line P6107 391-3-102(2)(e) 391-3-102(2)(b) None NA 391-3-102(2)(tt) P6108	P6106	Ink Application System	391-3-102(2)(b)	None	<u>NA</u>		
P6107 Extruders 391-3-102(2)(b) None NA P6108 Plastic Pellet Feed Hopper System 391-3-102(2)(b) 391-3-102(2)(b) P6109 Ink Application System 391-3-102(2)(b) None NA P6110 Extruders 391-3-102(2)(b) None NA P6111 Plastic Pellet Feed Hopper 391-3-102(2)(e) Out Filters P6111 Plastic Pellet Feed Hopper 391-3-102(2)(e) Out Filters P6111 Dust Filters Out Filters P6112 Plastic Pellet Feed Hopper 391-3-102(2)(e) Out Filters P6113 Out Filters Out Filters P6114 Plastic Pellet Feed Hopper 391-3-102(2)(e) Out Filters P6115 Out Filters Out Filters P6116 Out Filters Out Filters P6117 Out Filters P6118 Out Filters P6119 Out Filters P6110 Out Filters P6110 Out Filters P6111 Out Filters P6111 Out Filters P6112 Out Filters P6113 Out Filters P6114 Out Filters P6115 Out Filters P6116 Out Filters P6117 Out Filters P6118 Out Filters P6119 Out Filters P6110 Out Filters P6111 Out Filters P6111 Out Filters P6112 Out Filters P6113 Out Filters P6114 Out Filters P6115 Out Filters P6116 Out Filters P6117 Out Filters P6118 Out Filters P6118 Out Filters P6119 Out Filters P6110 Out Filters P6110 Out Filters P6111 Out Filters P6111 Out Filters P6112 Out Filters P6114 Out Filters P6115 Out Filters P6116 Out Filters P6117 Out Filters P6118 Out Filters P6119 Out Filters P6110 Out Filters P6110 Out Filters P6111 Out Filters P6111 Out Filters P6112 Out Filters P6113 Out Filters P6114 Out Filters P6115 Out Filters P6116 Out Filters P6117 O							
P6107 Extruders 391-3-102(2)(b) 391-3-102(2)(c) None NA P6108 Plastic Pellet Feed Hopper System 391-3-102(2)(c) 391-3-102(2)(b) C6108 Dust Filters P6109 Ink Application System 391-3-102(2)(c) 391-3-102(2)(b) 391-3-102(2)(b) 391-3-102(2)(t) None NA P6110 Extruders 391-3-102(2)(e) 391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(b) 391-3-102(2)(b) 391-3-102(2)(b) None NA P6111 Plastic Pellet Feed Hopper 391-3-102(2)(e) 201-02(2)(e) None NA			<u>Process Group – Extrusion Line</u>	P6107			
P6108							
P6108 Plastic Pellet Feed Hopper System 391-3-102(2)(e) 391-3-102(2)(e) C6108 Dust Filters P6109 Ink Application System 391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt) None NA Poccess Group – Extrusion Line P6110 391-3-102(2)(e) 391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(b) 391-3-102(2)(tt) None NA P6110 Extruders 391-3-102(2)(b) 391-3-102(2)(tt) None NA P6111 Plastic Pellet Feed Hopper 391-3-102(2)(e) C6111 Dust Filters	<u>P6107</u>	<u>Extruders</u>		<u>None</u>	NA NA		
System 391-3-102(2)(b)	D < 1.00	Di di Dili E ili		G(100	D. Dill.		
P6109 Ink Application System 391-3-102(2)(b) 391-3-102(2)(b) 391-3-102(2)(tt) None NA Process Group - Extrusion Line P6110 391-3-102(2)(e) 391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(b) 391-3-102(2)(tt) None NA P6111 Plastic Pellet Feed Hopper 391-3-102(2)(e) C6111 Dust Filters	<u>P6108</u>			<u>C6108</u>	<u>Dust Filters</u>		
P6109 Ink Application System 391-3-102(2)(b) 391-3-102(2)(tt) None NA Process Group - Extrusion Line P6110 P6110 Extruders 391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt) None NA P6111 Plastic Pellet Feed Hopper 391-3-102(2)(e) C6111 Dust Filters		System					
391-3-102(2)(tt) Process Group - Extrusion Line P6110 391-3-102(2)(e) 391-3-102(2)(b) None NA 391-3-102(2)(tt) P6111 Plastic Pellet Feed Hopper 391-3-102(2)(e) C6111 Dust Filters	D6100	Ink Application System		None	NA		
Process Group - Extrusion Line P6110 391-3-102(2)(e) None NA 391-3-102(2)(th) P6111 Plastic Pellet Feed Hopper 391-3-102(2)(e) C6111 Dust Filters	10103	mk Application System		INOILE	17/1		
P6110 Extruders 391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt) None NA P6111 Plastic Pellet Feed Hopper 391-3-102(2)(e) C6111 Dust Filters							
P6110 Extruders 391-3-102(2)(b) 391-3-102(2)(tt) None NA P6111 Plastic Pellet Feed Hopper 391-3-102(2)(e) C6111 Dust Filters				1 0110			
391-3-102(2)(tt) Plastic Pellet Feed Hopper 391-3-102(2)(e) C6111 Dust Filters	P6110	Extruders		None	NA		
P6111 Plastic Pellet Feed Hopper 391-3-102(2)(e) C6111 Dust Filters	10110	EAUTUCES		110110	_		
	P6111	Plastic Pellet Feed Hopper		C6111	<u>Dust Filters</u>		

	Emission Units	Applicable		Air Pollution Control Devices	
ID No.	Description	Requirements/Standards	ID No.	Description	
12 110.	Description	391-3-102(2)(e)	12 110	Description	
P6112	Ink Application System	391-3-102(2)(b)	None	<u>NA</u>	
	**	<u>391-3-102(2)(tt)</u>			
		<u>Process Group – Extrusion Line</u>	P6113		
		<u>391-3-102(2)(e)</u>			
<u>P6113</u>	<u>Extruders</u>	<u>391-3-102(2)(b)</u>	<u>None</u>	<u>NA</u>	
D (1 1 1	Di di Dili E ili	391-3-102(2)(tt)	06114	D. P.	
<u>P6114</u>	Plastic Pellet Feed Hopper	391-3-102(2)(e) 391-3-102(2)(b)	<u>C6114</u>	<u>Dust Filters</u>	
	<u>System</u>	391-3-102(2)(e)			
P6115	Ink Application System	391-3-102(2)(b)	None	<u>NA</u>	
10115	ink rippireution bystein	391-3-102(2)(tt)	Ttone		
	•	Process Group – Extrusion Line	P6116	,	
		391-3-102(2)(e)			
P6116	<u>Extruders</u>	391-3-102(2)(b)	None	<u>NA</u>	
		391-3-102(2)(tt)			
<u>P6117</u>	Plastic Pellet Feed Hopper	<u>391-3-102(2)(e)</u>	<u>C6117</u>	<u>Dust Filters</u>	
	<u>System</u>	391-3-102(2)(b)			
DC110	Inter Application System	391-3-102(2)(e)	Name	NI A	
<u>P6118</u>	Ink Application System	391-3-102(2)(b) 391-3-102(2)(tt)	<u>None</u>	NA NA	
		Process Group – Extrusion Line	P6119		
		391-3-102(2)(e)	1011)		
P6119	<u>Extruders</u>	391-3-102(2)(b)	None	<u>NA</u>	
		391-3-102(2)(tt)			
P6120	Plastic Pellet Feed Hopper	391-3-102(2)(e)	<u>C6120</u>	<u>Dust Filters</u>	
	<u>System</u>	391-3-102(2)(b)			
DC121	Int. Application Contains	391-3-102(2)(e)		274	
<u>P6121</u>	Ink Application System	391-3-102(2)(b) 391-3-102(2)(tt)	<u>None</u>	NA NA	
		Process Group – Extrusion Line	P6122	<u> </u>	
		391-3-102(2)(e)	10122		
P6122	<u>Extruders</u>	391-3-102(2)(b)	None	<u>NA</u>	
10122		391-3-102(2)(tt)			
P6123	Plastic Pellet Feed Hopper	391-3-102(2)(e)	C6123	<u>Dust Filters</u>	
	<u>System</u>	<u>391-3-102(2)(b)</u>			
		<u>391-3-102(2)(e)</u>		27.	
<u>P6124</u>	Ink Application System	391-3-102(2)(b)	<u>None</u>	NA NA	
		391-3-102(2)(tt) Process Group – Extrusion Line	D6125		
		391-3-102(2)(e)	10123		
P6125	Extruders	391-3-102(2)(b)	None	NA NA	
10123		391-3-102(2)(tt)			
P6126	Plastic Pellet Feed Hopper	391-3-102(2)(e)	C6126	<u>Dust Filters</u>	
	System	<u>391-3-102(2)(b)</u>			
		<u>391-3-102(2)(e)</u>			
P6127	Ink Application System	391-3-102(2)(b)	<u>None</u>	NA NA	
	Due	391-3-102(2)(tt)	Line DC120		
	Pro	cess Group – Tandem Extrusion I 391-3-102(2)(e)	Line P0128	I	
P6128	Extruders	391-3-102(2)(b) 391-3-102(2)(b)	None	NA	
10120	<u> </u>	391-3-102(2)(tt)	110110		
P6129	Plastic Pellet Feed Hopper	391-3-102(2)(e)	C6129	Dust Filters	
	System	391-3-102(2)(b)			
		391-3-102(2)(e)			
<u>P6130</u>	Ink Application System	391-3-102(2)(b)	None	<u>NA</u>	
		391-3-102(2)(tt)			
D6121	Drawing Machine	391-3-102(2)(e) 391-3-102(2)(b)	None	<u>NA</u>	
<u>P6131</u>	Drawing Wacinne	391-3-102(2)(tt)	INOILE	17/1	
<u> </u>	ı	<u>5,151.02(2)(tt)</u>	1	I .	

	Emission Units	Applicable	Ai	ir Pollution Control Devices		
ID No.	Description	Requirements/Standards	ID No.	Description		
	•	Process Group – Extrusion Line	P6132	•		
		391-3-102(2)(e)	T			
P6132	<u>Extruders</u>	391-3-102(2)(b)	None	<u>NA</u>		
		<u>391-3-102(2)(tt)</u>				
P6133	Plastic Pellet Feed Hopper	<u>391-3-102(2)(e)</u>	<u>C6133</u>	<u>Dust Filters</u>		
	System	391-3-102(2)(b)				
D:101	T. 1. 1	391-3-102(2)(e)				
<u>P6134</u>	Ink Application System	391-3-102(2)(b)	None None	<u>NA</u>		
		391-3-102(2)(tt) 391-3-102(2)(e)	+			
P6135	Drawing Machine	391-3-102(2)(b)	None	<u>NA</u>		
10133	Diawing Wachine	391-3-102(2)(tt)	110110	1111		
Process Group – Extrusion Line 740-18 750-55						
		391-3-102(2)(e)				
P115	Extruder 750-09 750-55	391-3-102(2)(b)	None	NA		
		391-3-102(2)(tt)				
H115	Plastic Pellet Feed Hopper	391-3-102(2)(e)	C115	Dust Filters		
пп	System	391-3-102(2)(b)	C113	Dust Filters		
		391-3-102(2)(e)				
I115	Ink Application System	391-3-102(2)(b)	None	NA		
		391-3-102(2)(tt)				
	T	Miscellaneous				
P6142	Cu Dual Drawing Machine	391-3-102(2)(e) 391-3-102(2)(b)				
<u>F0142</u>	Cu Duai Drawnig Macinile	391-3-102(2)(tt)	None	<u>NA</u>		
		391-3-102(2)(e)	+			
P6143	Cu Dual Drawing Machine	391-3-102(2)(b)	None	<u>NA</u>		
	Cu Duai Diaming macini	391-3-102(2)(tt)				
		391-3-102(2)(e)				
<u>P6144</u>	Cu Dual Drawing Machine	<u>391-3-102(2)(b)</u>	None	<u>NA</u>		
		391-3-102(2)(tt)				
D < 1.4 %		391-3-102(2)(e)				
<u>P6145</u>	Cu Dual Drawing Machine	391-3-102(2)(b)	<u>None</u>	<u>NA</u>		
		391-3-102(2)(tt) 391-3-102(2)(e)	+			
<u>P6146</u>	Ink Application System	391-3-102(2)(b)	None	<u>NA</u>		
		391-3-102(2)(e)	+			
P6147	Ink Application System	391-3-102(2)(b)	None	<u>NA</u>		
		391-3-102(2)(tt)				
P6138	Silo	391-3-102(2)(e)	C6138	Bin Vent Filter		
F0136	3110	<u>391-3-102(2)(b)</u>	<u>C0136</u>	Bill Vent Filter		
P6139	Silo	<u>391-3-102(2)(e)</u>	C6139	Bin Vent Filter		
	<u> </u>	391-3-102(2)(b)		<u> </u>		
P6140	Silo	391-3-102(2)(e)	C6140	Bin Vent Filter		
		391-3-102(2)(b) 391-3-102(2)(e)				
<u>P6141</u>	Silo	391-3-102(2)(b)	<u>C6141</u>	Bin Vent Filter		
	Pr	ocess Group – Tandem Extrusion	Line P6054	1		
		391-3-102(2)(e)	T			
P6054	Extruder	391-3-102(2)(b)	None	NA		
		391-3-102(2)(tt)				
P6055	Plastic Pellet Feed	391-3-102(2)(e)	<u>C6055</u>	<u>Dust Filters</u>		
	Hopper System	391-3-102(2)(b)		Z GOV X MAVA D		
D(05)	Tale Asself and G. 4	391-3-102(2)(e)	N.	NA		
P6056	Ink Application System	391-3-102(2)(b)	None	NA		
		391-3-102(2)(tt)				
		301_3_1_ ()2(2)(a)				
P6057	Drawing Machine	391-3-102(2)(e) 391-3-102(2)(b)	None	NA		
P6057	Drawing Machine	391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt)	None	NA		

	Emission Units	Applicable	Ai	r Pollution Control Devices
ID No.	Description	Requirements/Standards	ID No.	Description
	•	391-3-102(2)(e)		•
P6001	Extruder	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
D < 0.0.0	Plastic Pellet Feed	391-3-102(2)(e)	0.000	
P6002	Hopper System	391-3-102(2)(b)	<u>C6002</u>	<u>Dust Filters</u>
	TF	391-3-102(2)(e)		
P6003	Ink Application System	391-3-102(2)(b)	None	NA
2 0000	in rippireuron system	391-3-102(2)(tt)	110220	
		Process Group – PVC Jacket Line	P6004	1
		391-3-102(2)(e)		
P6004	Extruder	391-3-102(2)(b)	None	NA
2000.		391-3-102(2)(tt)	110220	
	Plastic Pellet Feed	391-3-102(2)(e)		
P6005	Hopper System	391-3-102(2)(b)	<u>C6005</u>	<u>Dust Filters</u>
	Hopper System	391-3-102(2)(e)		
P6006	Ink Application System	391-3-102(2)(b)	None	NA
1 0000	The Application System	391-3-102(2)(tt)	None	IVA
		Process Group – PVC Jacket Line	D6007	
			P0007	T
D<00=		391-3-102(2)(e)		37.
P6007	Extruder	391-3-102(2)(b)	None	NA
	+	391-3-102(2)(tt)		
P6008	Plastic Pellet Feed	391-3-102(2)(e)	C6008	Dust Filters
1 0000	Hopper System	391-3-102(2)(b)	20000	<u>Bust I itters</u>
		391-3-102(2)(e)		
P6009	Ink Application System	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
		Process Group - PVC Jacket Line	P6010	
		391-3-102(2)(e)		
P6010	Extruder	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
P6011	Plastic Pellet Feed	391-3-102(2)(e)	C6011	Dust Filters
10011	Hopper System	391-3-102(2)(b)	<u>C0011</u>	<u>Dust Filters</u>
		391-3-102(2)(e)		
P6012	Ink Application System	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
	•	Process Group – PVC Jacket Line	P6013	
		391-3-102(2)(e)		
P6013	Extruder	391-3-102(2)(b)	None	NA NA
		391-3-102(2)(tt)		
D.(0.1.4	Plastic Pellet Feed	391-3-102(2)(e)	0.014	
P6014	Hopper System	391-3-102(2)(b)	<u>C6014</u>	<u>Dust Filters</u>
	TP	391-3-102(2)(e)		
P6015	Ink Application System	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
	1	Process Group – PVC Jacket Line	P6016	l
		391-3-102(2)(e)		
P6016	1		None	NA
	Extruder	1 391-3-1UZ(Z)(D)		
	Extruder	391-3-102(2)(b) 391-3-102(2)(tt)	None	
		391-3-102(2)(tt)		
P6017	Plastic Pellet Feed	391-3-102(2)(tt) 391-3-102(2)(e)	<u>C6017</u>	Dust Filters
		391-3-102(2)(tt) 391-3-102(2)(e) 391-3-102(2)(b)		
P6017	Plastic Pellet Feed Hopper System	391-3-102(2)(tt) 391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(e)	<u>C6017</u>	<u>Dust Filters</u>
	Plastic Pellet Feed	391-3-102(2)(tt) 391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(e) 391-3-102(2)(b)		
P6017	Plastic Pellet Feed Hopper System	391-3-102(2)(tt) 391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(e) 391-3-102(2)(t) 391-3-102(2)(tt)	<u>C6017</u> None	<u>Dust Filters</u>
P6017	Plastic Pellet Feed Hopper System	391-3-102(2)(tt) 391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt) Process Group – PVC Jacket Line	<u>C6017</u> None	<u>Dust Filters</u>
P6017 P6018	Plastic Pellet Feed Hopper System Ink Application System	391-3-102(2)(tt) 391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt) Process Group – PVC Jacket Line 391-3-102(2)(e)	C6017 None P6019	Dust Filters NA
P6017	Plastic Pellet Feed Hopper System	391-3-102(2)(tt) 391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt) Process Group – PVC Jacket Line 391-3-102(2)(e) 391-3-102(2)(b)	<u>C6017</u> None	<u>Dust Filters</u>
P6017 P6018	Plastic Pellet Feed Hopper System Ink Application System Extruder	391-3-102(2)(tt) 391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(e) 391-3-102(2)(tt) Process Group – PVC Jacket Line 391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt)	C6017 None P6019	Dust Filters NA
P6017 P6018	Plastic Pellet Feed Hopper System Ink Application System	391-3-102(2)(tt) 391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt) Process Group – PVC Jacket Line 391-3-102(2)(e) 391-3-102(2)(b)	C6017 None P6019	Dust Filters NA

	Emission Units	Applicable	Ai	r Pollution Control Devices
ID No.	Description	Requirements/Standards	ID No.	Description
	•	391-3-102(2)(e)		•
P6021	Ink Application System	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
	T	Process Group – PVC Jacket Line	e P6022	1
D(022	F ()	391-3-102(2)(e)		NTA.
P6022	Extruder	391-3-102(2)(b)	None	NA
	Plastic Pellet Feed	391-3-102(2)(tt) 391-3-102(2)(e)	+	
P6023	Hopper System	391-3-102(2)(b)	<u>C6023</u>	<u>Dust Filters</u>
	Hopper System	391-3-102(2)(e)		
P6024	Ink Application System	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
		Process Group - PVC Jacket Line	e P6025	
		391-3-102(2)(e)		
P6025	Extruder	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
P6026	Plastic Pellet Feed	391-3-102(2)(e)	C6026	Dust Filters
10020	Hopper System	391-3-102(2)(b)	20020	<u>Bust I iters</u>
D.(025		391-3-102(2)(e)	N T	N/A
P6027	Ink Application System	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt) Miscellaneous		
		391-3-102(2)(e)	1	
P6034	PVC Storage Silo	391-3-102(2)(b)	<u>C6034</u>	Bin vent filter
		391-3-102(2)(e)		
<u>P6136</u>	PVC Storage Silo	391-3-102(2)(b)	<u>C6136</u>	<u>Bin vent filter</u>
D(125	DVG Gt GT	391-3-102(2)(e)	07125	D: (61)
<u>P6137</u>	PVC Storage Silo	391-3-102(2)(b)	<u>C6137</u>	Bin vent filter
		Process Group – PVC Extrus	ion	
		391-3-102(2)(e)		
P6028	Extruder	391-3-102(2)(b)	NA	NA
		391-3-102(2)(tt)		
P6148	Plastic Pellet Feed	391-3-102(2)(e)	C6148	<u>Dust Filter</u>
	Hopper System	391-3-102(2)(b)	+	
P6029	Extruder	391-3-102(2)(e) 391-3-102(2)(b)	NA	NA
F0029	Extruder	391-3-102(2)(tt)	INA	NA NA
	Plastic Pellet Feed	391-3-102(2)(t)		
<u>P6149</u>	Hopper System	391-3-102(2)(b)	<u>C6149</u>	<u>Dust Filter</u>
	110pper System	391-3-102(2)(e)		
P6030	Extruder	391-3-102(2)(b)	NA	NA
		391-3-102(2)(tt)		
P6150	Plastic Pellet Feed	391-3-102(2)(e)	C6150	Dust Filter
10130	Hopper System	391-3-102(2)(b)	<u>C0130</u>	<u>Dust Filter</u>
		391-3-102(2)(e)		
P6031	Extruder	391-3-102(2)(b)	NA	NA
	D. C. D. H. C. L.	391-3-102(2)(tt)	1	
P6151	Plastic Pellet Feed	391-3-102(2)(e)	C6151	<u>Dust Filter</u>
	Hopper System	391-3-102(2)(b) 301-3-102(2)(c)		
P6032	Fytruder	391-3-102(2)(e) 391-3-102(2)(b)	NA	NA
P0032	Extruder	391-3-102(2)(tt)	11//	11/2
=	Plastic Pellet Feed	391-3-102(2)(t)		
<u>P6152</u>	Hopper System	391-3-102(2)(b)	<u>C6152</u>	<u>Dust Filter</u>
		391-3-102(2)(e)		
P6033	Extruder	391-3-102(2)(b)	NA	NA
		391-3-102(2)(tt)		
P6153	Plastic Pellet Feed	<u>391-3-102(2)(e)</u>	C6153	Dust Filter
1 0133	Hopper System	<u>391-3-102(2)(b)</u>		Dust Filter
	P	rocess Group – Tandem Extrusion l	Line P6038	

	Emission Units	Applicable	Ai	r Pollution Control Devices
ID No.	Description	Requirements/Standards	ID No.	Description
12 1101	2 escription	391-3-102(2)(e)	12 110	Description
P6038	Extruder	391-3-102(2)(b)	None	NA
10000	Entrado:	391-3-102(2)(tt)	Tione	
	Plastic Pellet Feed	391-3-102(2)(e)		
P6039	Hopper System	391-3-102(2)(b)	<u>C6039</u>	<u>Dust Filters</u>
	Tropper System	391-3-102(2)(e)		
P6040	Ink Application System	391-3-102(2)(b)	None	NA
1 0040	The Application System	391-3-102(2)(tt)	None	IVA
		391-3-102(2)(tt)		
P6041	Drawing Machine	391-3-102(2)(b)	None	NA
10041	Drawing Macinine	391-3-102(2)(tt)	None	IVA
	D.	cocess Group – Tandem Extrusion I	ine D6042	
		391-3-102(2)(e)	Inte F 0042	1
P6042	Extruder		None	NA
P0042	Extruder	391-3-102(2)(b)	None	INA
	DI C DII C I	391-3-102(2)(tt)		
P6043	Plastic Pellet Feed	391-3-102(2)(e)	C6043	<u>Dust Filters</u>
	Hopper System	391-3-102(2)(b)	<u> </u>	
DC044		391-3-102(2)(e)	N T	374
P6044	Ink Application System	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
		391-3-102(2)(e)		
P6045	Drawing Machine	391-3-102(2)(b)	None	NA
	_	391-3-102(2)(tt)		
	Pı	ocess Group - Tandem Extrusion I	Line P6046	,
		391-3-102(2)(e)		
P6046	Extruder	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
P6047	Plastic Pellet Feed	391-3-102(2)(e)	C6047	<u>Dust Filters</u>
10047	Hopper System	391-3-102(2)(b)	20047	Dust Titers
		391-3-102(2)(e)		
P6048	Ink Application System	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
		391-3-102(2)(e)		
P6049	Drawing Machine	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
	Pı	ocess Group – Tandem Extrusion I	Line P6050	
		391-3-102(2)(e)		
P6050	Extruder	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
P6051	Plastic Pellet Feed	391-3-102(2)(e)	C6051	Dugt Filtons
10021	Hopper System	391-3-102(2)(b)	<u>C6051</u>	<u>Dust Filters</u>
		391-3-102(2)(e)		
P6052	Ink Application System	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
		391-3-102(2)(e)		
P6053	Drawing Machine	391-3-102(2)(b)	None	NA
-	g	391-3-102(2)(tt)		
	1		1	1

	Emission Units	Applicable	Ai	r Pollution Control Devices
ID No.	Description	Requirements/Standards	ID No.	Description
MC Pla	nt [C]			
P3027	MC Armoring Lines P3027	391-3-102(2)(e)	None	<u>NA</u>
thru P3036	through P3036	<u>391-3-102(2)(b)</u>		
		<u>391-3-102(2)(tt)</u>		
P3040	MC Armoring Line Printers	<u>391-3-102(2)(e)</u>	<u>None</u>	<u>NA</u>
thru P3052	P3040 through P3052	<u>391-3-102(2)(b)</u>		
		391-3-102(2)(tt)		
		40 CFR 63 Subpart A		
		40 CFR 63 Subpart MMMM		
	Pr	ocess Group – Tandem Extrusion L	Line P3001	
P3002	Plastic Pellet Feed	391-3-102(2)(e)	C3002	<u>Dust Filters</u>
	Hopper System	391-3-102(2)(b)		
		391-3-102(2)(tt)		
P3001	Extruders 756-01	391-3-102(2)(e)	None	NA
		391-3-102(2)(b)		
		391-3-102(2)(tt)		
P3003	Ink Application System	391-3-102(2)(e)	None	NA
		391-3-102(2)(b)		
		391-3-102(2)(tt)		
P3004	Cu Drawing Machine	391-3-102(2)(e)	None	NA
	with Annealer	391-3-102(2)(b)		
		391-3-102(2)(tt)		

Emission Units		Applicable	Ai	r Pollution Control Devices
ID No.	Description	Requirements/Standards	ID No.	Description
Coppe	r Rod Mill (D)			
		Miscellaneous		
P477	Cu Drawing Machine with	391-3-102(2)(e)	None	NA
	Annealer	391-3-102(2)(b)		
		391-3-102(2)(tt)		
P478	Cu/Al Drawing Machine	391-3-102(2)(e)	C478	Oil Mist Collector
	with Annealer	391-3-102(2)(b)		
		391-3-102(2)(tt)		
F476	Electric Induction Vertirod	391-3-102(2)(e)	None	NA.
	Copper Rod Production	391-3-102(2)(b)		
	Unit	391-3-102(2)(g)		
		391-3-102(2)(tt)		
<u>ST1</u>	8,000-gal IPA tank	391-3-1.02(2)(b)	None None	NA NA
		<u>391-3-1.02(2)(vv)</u>		
		<u>391-3-102(2)(d)</u>		
<u>P480</u>	Propane Vaporizer	391-3-102(2)(g)	None None	NA NA
		391-3-102(2)(tt)		
		40 CFR 63 Subpart A		
		40 CFR 63 Subpart DDDDD		
<u>P481</u>	Propane Vaporizer	<u>391-3-102(2)(d)</u>	<u>None</u>	NA NA
		<u>391-3-102(2)(g)</u>		
		391-3-102(2)(tt)		
		40 CFR 63 Subpart A		
Y		40 CFR 63 Subpart DDDDD		

	Emission Units	Applicable	A	ir Pollution Control Devices		
ID No.	Description	Requirements/Standards	ID No.	Description		
	Products Plant (E)	•				
Othicy	Products Plaint (E	Process Group –Extrusion Line 7	50.05			
		391-3-102(2)(e)	<u> </u>			
P250	Extruders 750-05	391-3-102(2)(b)	None	NA		
		391-3-102(2)(tt)				
11250	Plastic Pellet Feed Hopper	391-3-102(2)(e)	Mosso	NA		
<u>H250</u>	<u>System</u>	<u>391-3-102(2)(b)</u>	<u>None</u>	<u>NA</u>		
		<u>391-3-102(2)(e)</u>				
<u>P251</u>	Ink Application System	391-3-102(2)(b)	<u>None</u>	<u>NA</u>		
	<u>391-3-102(2)(tt)</u> Process Group – Extrusion Line 740-02					
		391-3-102(2)(e)	40-02			
P262	Extruders 740-02	391-3-102(2)(b)	None	NA.		
1202	<u> </u>	391-3-102(2)(tt)	110110	177.1		
11262	Plastic Pellet Feed Hopper	<u>391-3-102(2)(e)</u>	N 7	NA		
<u>H262</u>	<u>System</u>	<u>391-3-102(2)(b)</u>	<u>None</u>	<u>NA</u>		
		<u>391-3-102(2)(e)</u>				
<u>P263</u>	Ink Application System	<u>391-3-102(2)(b)</u>	<u>None</u>	<u>NA</u>		
		391-3-102(2)(tt)				
<u>P744</u>	Drawing Machine with	391-3-102(2)(e) 391-3-102(2)(b)	<u>C744</u>	Oil Mist Collector		
-1 / 4 4	<u>Annealer 450-05</u>	391-3-102(2)(tt)		On what conector		
		Process Group - Extrusion Line F	27069			
		391-3-102(2)(e)				
P7069	<u>Extruders</u>	391-3-102(2)(b)	None	<u>NA</u>		
		391-3-102(2)(tt)				
P7070	Plastic Pellet Feed Hopper	<u>391-3-102(2)(e)</u>	C7070	Dust Collector		
	<u>System</u>	391-3-102(2)(b)				
P7071	Ink Application System	391-3-102(2)(e) 391-3-102(2)(b)	None	NA		
17071	IIIK Application System	391-3-102(2)(tt)	None	INA		
		Process Group - Extrusion Line F	7072			
		391-3-102(2)(e)				
<u>P7072</u>	<u>Extruders</u>	391-3-102(2)(b)	<u>None</u>	<u>NA</u>		
		391-3-102(2)(tt)				
P7073	Plastic Pellet Feed Hopper	<u>391-3-102(2)(e)</u>	C7073	Dust Collector		
	<u>System</u>	391-3-102(2)(b)	ļ 			
P7074	Ink Application System	391-3-102(2)(e) 391-3-102(2)(b)	None	NA.		
17074	nik Application System	391-3-102(2)(tt)	None	IVA		
	l	Miscellaneous	1	•		
		391-3-102(2)(e)				
<u>P7029</u>	Ink Application System	391-3-102(2)(b)	<u>None</u>	<u>NA</u>		
		391-3-102(2)(tt)				
D5020		<u>391-3-102(2)(e)</u>		37.4		
<u>P7030</u>	Ink Application System	391-3-102(2)(b) 391-3-102(2)(tt)	<u>None</u>	<u>NA</u>		
		391-3-102(2)(tt) 391-3-102(2)(e)				
P7031	Ink Application System	391-3-102(2)(b)	None	<u>NA</u>		
17001	in i ippiiouisi system	391-3-102(2)(tt)	110110			
		391-3-102(2)(e)				
P7032	Ink Application System	391-3-102(2)(b)	None	<u>NA</u>		
		391-3-102(2)(tt)				
D7022	T.I.A. II. C. C.	391-3-102(2)(e)	l N	NA		
<u>P7033</u>	Ink Application System	391-3-102(2)(b) 301-3-102(2)(tt)	<u>None</u>	<u>NA</u>		
		391-3-102(2)(tt) 391-3-102(2)(e)				
P7034	Ink Application System	391-3-102(2)(b)	None	<u>NA</u>		
		391-3-102(2)(tt)	1			
		. 		ı		

	Emission Units	Applicable	Ai	r Pollution Control Devices
ID No.	Description	Requirements/Standards	ID No.	Description
<u>P7035</u>	Ink Application System	391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt)	None	NA NA
<u>P7036</u>	Ink Application System	391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt)	None	<u>NA</u>
<u>P7037</u>	Ink Application System	391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt)	None	<u>NA</u>
<u>P7038</u>	Ink Application System	391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt)	None	<u>NA</u>
<u>P7039</u>	Ink Application System	391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt)	None	<u>NA</u>
<u>P7040</u>	Ink Application System	391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt)	None	<u>NA</u>
<u>P7041</u>	Ink Application System	391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt)	None	<u>NA</u>
<u>P7042</u>	Ink Application System	391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt)	None	<u>NA</u>
<u>P7043</u>	Ink Application System	391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt)	None	<u>NA</u>
<u>P7044</u>	Ink Application System	391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt)	None	<u>NA</u>
<u>P7045</u>	Ink Application System	391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt)	None	<u>NA</u>
<u>P7046</u>	Ink Application System	391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt)	None	<u>NA</u>
<u>P7047</u>	Ink Application System	391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt)	None	<u>NA</u>
<u>P7048</u>	Ink Application System	391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt)	<u>None</u>	<u>NA</u>
<u>P7049</u>	Ink Application System	391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt)	<u>None</u>	<u>NA</u>
<u>P7050</u>	Ink Application System	391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt)	<u>None</u>	<u>NA</u>
<u>P7051</u>	Ink Application System	391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt)	<u>None</u>	<u>NA</u>
<u>P7052</u>	Drawing Machine	391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt)	<u>C7052</u>	Oil Mist Collector
<u>P7053</u>	Drawing Machine	391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt)	<u>C7053</u>	Oil Mist Collector
<u>P7054</u>	Drawing Machine	391-3-102(2)(e) 391-3-102(2)(b) 391-3-102(2)(tt)	<u>C7054</u>	Oil Mist Collector

	Emission Units	Applicable	A	ir Pollution Control Devices
ID No.	Description	Requirements/Standards	ID No.	Description
12 1100	Description	391-3-102(2)(e)	12 1101	Description
P7055	Drawing Machine	391-3-102(2)(b)	C7055	Oil Mist Collector
		391-3-102(2)(tt)		
		391-3-102(2)(e)		
P7056	Drawing Machine	391-3-102(2)(b)	C7056	Oil Mist Collector
		391-3-102(2)(tt)		
		391-3-102(2)(d)		
	0.00 MMD 4 M 1	391-3-102(2)(g)		
P7057	9.98 MMBtu/hr Natural Gas Steam Generator	391-3-102(2)(tt)	None	<u>NA</u>
	Gas Steam Generator	40 CFR 63 Subpart A		
		40 CFR 63 Subpart DDDDD		
		391-3-102(2)(d)		
	9.98 MMBtu/hr Natural	391-3-102(2)(g)		
P7058	Gas Steam Generator	391-3-102(2)(tt)	None None	<u>NA</u>
	Gas Steam Generator	40 CFR 63 Subpart A		
		40 CFR 63 Subpart DDDDD		
		391-3-102(2)(d)		
P7059-	0.996 MMBtu/hr	<u>391-3-102(2)(g)</u>		
P7068	Humidifier (each)	391-3-102(2)(tt)	<u>None</u>	<u>NA</u>
17000	Transcrive (caesty	40 CFR 63 Subpart A		
		40 CFR 63 Subpart DDDDD		
		CAMV Line 2	T	
5		391-3-102(2)(e)		
P7001	Extruder	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
D=000		391-3-102(2)(e)		27.4
P7002	Extruder	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
D7002	F-41	391-3-102(2)(e)	N T	NTA
P7003	Extruder	391-3-102(2)(b) 391-3-102(2)(tt)	None	NA
	Plastic Pellet Feed	•		
P7004	Hopper System	391-3-102(2)(e)	C7004	<u>Dust Filter</u>
	Plastic Pellet Feed	391-3-102(2)(b) 391-3-102(2)(e)		
P7005	Hopper System	391-3-102(2)(b)	<u>C7005</u>	<u>Dust Filter</u>
	Plastic Pellet Feed	391-3-102(2)(e)		
P7006	Hopper System	391-3-102(2)(b)	<u>C7006</u>	<u>Dust Filter</u>
	Hopper System	391-3-102(2)(e)		
P7007	Ink application System	391-3-102(2)(b)	None	NA
17007	The application System	391-3-102(2)(tt)	None	14A
		391-3-102(2)(e)		
P7008	Ink application System	391-3-102(2)(b)	None	NA
1,000	ти присиной бузили	391-3-102(2)(tt)	TOHC	1112
	_1	CAMV Line 3	1	
		391-3-102(2)(e)		
P7009	Extruder	391-3-102(2)(b)	None	NA
1,007	12AU UUCI	391-3-102(2)(tt)	TOHE	11/13
		391-3-102(2)(e)		
P7010	Extruder	391-3-102(2)(b)	None	NA
1,010	Dan uuci	391-3-102(2)(tt)	Tione	1112
		391-3-102(2)(e)		
P7011	Extruder	391-3-102(2)(b)	None	NA
1,011	Dan uuci	391-3-102(2)(tt)	TOHC	1112
		391-3-102(2)(e)		
P7012	Plastic Pellet Feed	391-3-102(2)(b)	C7012	Dust Filter
1 /012	Hopper System	0/1 0 1 10M(M)(D)	C/012	Dust Filter
		391-3-102(2)(e)		
P7013	Plastic Pellet Feed	391-3-102(2)(e) 391-3-102(2)(b)	C7012	Dust Filter
F/013	Hopper System	371-3-102(2)(0)	<u>C7013</u>	<u>Dust Filter</u>
	FF 2, 200	1		_

Emission Units		Applicable	Air Pollution Control Devices	
ID No.	Description	Requirements/Standards	ID No.	Description
ID No.	Description	391-3-102(2)(e)	1D 110.	Description
P7014	Plastic Pellet Feed	391-3-102(2)(e) 391-3-102(2)(b)	C7014	Dust Filter
1 /014	Hopper System	371-3-102(2)(0)	<u>C7014</u>	<u>Dust Filter</u>
		391-3-102(2)(e)		
P7015	Ink application System	391-3-102(2)(b)	None	NA
17013	The application System	391-3-102(2)(tt)	None	TVA
		391-3-102(2)(e)		
P7016	Ink application System	391-3-102(2)(b)	None	NA
	upp	391-3-102(2)(tt)		
		391-3-102(2)(e)		
P7016	Ink application System	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
		Miscellaneous		
	5 Btu/hr Natural Gas Steam	391-3-102(2)(d)		
P7021	Generator	391-3-102(2)(b)	None	NA NA
	Generator	391-3-102(2)(g)		
	5 Btu/hr Natural Gas Steam	391-3-102(2)(d)		
P7022	Generator	391-3-102(2)(b)	None	NA
	Generator	391-3-102(2)(g)		
	5 Btu/hr Natural Gas Steam	391-3-102(2)(d)		
P7023	Generator	391-3-102(2)(b)	None	NA NA
	Generator	391-3-102(2)(g)		
	Curing Oven	391-3-102(2)(e)		
CS15		391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
		391-3-102(2)(e)	None	
CS16	Curing Oven	391-3-102(2)(b)		NA
		391-3-102(2)(tt)		
		391-3-102(2)(e)	None	NA
CS17	Curing Oven	391-3-102(2)(b)		
		391-3-102(2)(tt)		
		391-3-102(2)(e)		
CS18	Curing Oven	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
		391-3-102(2)(e)		
CS19	Curing Oven	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
~~~		391-3-102(2)(e)		
CS20	Curing Oven	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
~~ <b>~</b>		391-3-102(2)(e)		
CS21	Curing Oven	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
GGAA		391-3-102(2)(e)		374
CS22	Curing Oven	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
CCC	G	391-3-102(2)(e)	None	BTA
CS23	Curing Oven	391-3-102(2)(b)	None	NA
		391-3-102(2)(tt)		
0024	G	391-3-102(2)(e)	None	BTA
CS24	Curing Oven	391-3-102(2)(b)	None	NA
L	L	391-3-102(2)(tt)		

Emission Units		Applicable	Air Pollution Control Devices	
ID No.	Description	Requirements/Standards	ID No.	Description
Cofer 1	echnology Cente	r ( <b>G</b> )		
P910	Vertical tray flame chamber	391-3-102(2)(b) 391-3-102(2)(g) 391-3-102(2)(e) 391-3-102(2)(tt)	- C910	C910 – Flat bed HEAF fabric filter
<del>P912</del>	Cone Calorimeter	391 3 1 .02(2)(b) 391 3 1 .02(2)(e) 391 3 1 .02(2)(tt)	OR C912	/ mist eliminator  C912 — Dual Scrubber
P913	French Flame Chamber	391 3 1 .02(2)(b) 391 3 1 .02(2)(e) 391 3 1 .02(2)(tt)		
<u>P911</u>	0.42 MMBtu/hr Propane Fired Boiler	391 3 1 .02(2)(d) 391 3 1 .02(2)(g) 391 3 1 .02(2)(tt) 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD	<u>N/A</u>	<u>N/A</u>

	<b>Emission Units</b>	Applicable	Ai	ir Pollution Control Devices
ID No.	Description	Requirements/Standards	ID No.	Description
Corpor	ate Energy Mana	gement (H)		
P804	1,552 hp gas-fired Waukesha Engine	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 40 CFR 60 Subpart A 40 CFR 60 Subpart JJJJ 391 3 1 .02(2)(g) 391 3 1 .02(2)(tb) 391 3 1 .02(2)(tt) 391 3 1 .02(2)(mmm)	C804	Air/Fuel Ratio Controller and Non-Selective Catalytic Reduction
P805	1,548 hp gas fired Waukesha Engine	40 CFR 60 Subpart A 40 CFR 60 Subpart JJJJ 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391 3 1 .02(2)(g) 391 3 1 .02(2)(tt) 391 3 1 .02(2)(mmm)	<del>C805</del>	Air/Fuel Ratio Controller and Non-Selective Catalytic Reduction
P806	1,548 hp gas-fired Waukesha Engine	40 CFR 60 Subpart A 40 CFR 60 Subpart JJJJ 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391 3 1 .02(2)(g) 391 3 1 .02(2)(tb) 391 3 1 .02(2)(tt) 391 3 1 .02(2)(mmm)	<del>C806</del>	Air/Fuel Ratio Controller and Non-Selective Catalytic Reduction
<u>P824</u>	35 kW Diesel-Fired Emergency Generator	391-3-1.02(2)(b) 391-3-1.02(2)(e) 391-3-1.02(2)(g) 391-3-1.02(2)(tt) 40 CFR 63 Subpart A 40 CFR 60 Subpart IIII 40 CFR 63 Subpart A 40 CFR 63 Subpart A	<u>None</u>	<u>NA</u>

Emission Units		Applicable	Air Pollution Control Devices	
ID No.	Description	Requirements/Standards	ID No.	Description
Tools a	nd Assembled Pro	oducts (I)		
<del>P970</del>	Blade Coating	40 CFR 63 Subpart A 40 CFR 63 Subpart MMMM 391- 3-102(2)(e) 391-3-102(2)(tb) 391-3-102(2)(tt)	None	NA.

^{*} Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

## C. Equipment & Rule Applicability

## **Emission and Operating Caps** –

As discussed above, in order to ensure that the project does not exceed the PSD threshold for PM/PM₁₀/PM_{2.5} emissions, the Division will impose a PM₁₀ limit to 12.5 tons per year for the Modernization 1 and 2 project as described in Application Number 632967 rather than 12.93 tons per year. In addition, the Division will modify the proposed PM_{2.5} limit to 7.5 tons per year for the Modernization 1 and 2 project as described in Application Number 632967 rather than 7.93 tons per year. The Division will also require operating of dust filters and oil mist eliminators at all times that applicable equipment is operating.

To avoid applicability of PSD to the proposed modification for VOC emissions as discussed earlier in this document, the Division will impose a VOC limit to 71 tons per year for the project as described in Application Number 632967. The Division will also require operating of control equipment at all times that applicable equipment is operating.

The facility will also be required to continue to comply with all applicable regulations and limitations for equipment that will be removed from the facility over the next two years until applicable equipment has been removed.

To avoid applicability of 40 CFR 63, Subpart B, the facility proposes to take applicable HAP emission limits. The Division will impose an individual HAP emission limit of 9.6 tons per year and a combined HAP emissions limit of 24.9 tons per year as discussed below.

#### **Applicable Rules and Regulations -**

Rules and regulations associated with modification will be discussed only. For a detail of rules and regulations applicable to this facility, please see the narrative associated with Title V Permit Number 3357-045-0008-V-05-0.

Part 60, Chapter I, Title 40 of the Code of Federal Regulations (40 CFR 60) - New Source Performance Standards (NSPS) Subpart A – General Provisions

Except as provided in Subparts B and C of 40 CFR 60, the provisions of this regulation apply to the owner or operator of any stationary source which contains an affected facility, the construction or modification of which is commenced after the date of publication in this part of any standard (or, if earlier, the date of publication of any proposed standard) applicable to that facility [40 CFR 60.1(a)]. Any new or revised standard of performance promulgated pursuant to Section 111(b) of the Clean Air Act applies to equipment located at the Southwire site for which the construction or modification is commenced after the date of publication in 40 CFR 60 of such new or revised standard (or, if earlier, the date of publication of any proposed standard) applicable to that equipment and/or processes [40 CFR 60.1(b)]. Southwire has equipment located at this facility subject to 40 CFR 60.

40 CFR 60 NSPS Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

This regulation applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British Thermal Units per hour) or less, but greater than or equal to 2.9 MW (10 million British Thermal Units per hour) [40 CFR 60.40c(a)].

Southwire is proposing to install two (2) steam generators (P7057 and P7058) each with a heat input capacity of 9.98 million British Thermal Units Per Hour ( $10^6$  Btu/hr) or ten ( $10^6$ ) humidifiers (P7059-P7068) each with a heat input capacity of 0.996 x  $10^6$  Btu/hr at the Utility Power Plant (UPP). None of the proposed units are subject to this regulation since the heat input capacity of each of these units is less than  $10 \times 10^6$  Btu/hr.

Southwire is also proposing to install two (2) propane vaporizers (P480 and P481) at the Copper Rod Mill (CRM). The original application submittal indicated that each of the vaporizers had a heat input capacity of 73.8 x 10⁶ Btu/hr. After reviewing the manufacturing specification sheet, it was determined that 72.8 MMBtu/hr is the rated *process* capacity and not the fuel firing rate according to Paige Murphy, Corporate Environmental Manager of *Southwire Company* (via an email dated January 25, 2023. Per the January 25, 2023 email, the vaporizer converts liquid propane to a gas so that it can be combusted in the system's standard gas burners. The propane vaporizer has a combustion rate of 0.88 x 10⁶ Btu/hr, and it does not actually have the capacity to burn propane at 72.8 x 10⁶ Btu/hr for fuel consumption. The emissions calculations were updated to reflect this change. Based on this burner size, these units are not subject to this regulation.

40 CFR 60, NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984

Storage vessels with a capacity greater than or equal to 75 cubic meters (m³) that are used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984. This regulation does not apply to storage vessels with a capacity greater than or equal to 151 m³ storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa) or with a capacity greater than or equal to 75 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure less than 15.0 kPa [40 CFR 60.110b(b)]. According to Application Number 632967, the proposed IPA storage tank (ST1) installed at the Copper Rod Mill (CRM) has a capacity greater than 75 but less than 151 cubic meters; therefore, the tank will not be subject to the standard.

40 CFR 60, NSPS Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

This regulation is applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (3) of 40 CFR 60.4200. For the purposes of this regulation, the date that construction commences is the date the engine is ordered by Southwire [40 CFR 62.4200(a)]. The new generator (P824) installed at the Corporative Energy Management (CEM) will be subject to this rule. Generator P824 is a 35 kilowatt (kW) diesel-fired emergency generator. Owners and operators of 2007 model year and later emergency stationary CI ICE with a displacement of less than 30 liters per cylinder that are not fire pump engines must comply with the emission standards for new nonroad CI engines in 40 CFR 60.4202, for all pollutants, for the same model year and maximum engine power for their 2007 model year and later emergency stationary CI ICE [40 CFR 42005(b)]. Southwire must operate and maintain generator P824 that achieve the emission standards as required in 40 CFR 60.4204 and 60.4205 according to the manufacturer's written instructions or procedures developed by Southwire that are approved by the engine manufacturer, over the entire life of the engine [40 CFR 60.4206]. An owner or operator of a 2007 model year and later stationary CI internal combustion engine that must comply with the emission standards specified in 40 CFR 60.4205(b) must comply by purchasing an engine certified to the emission standards in 40 CFR 60.4205(b) for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's emissionrelated specifications, except as permitted in 40 CFR 60.421(g) [40 CFR 60.421(c)]. Southwire purchased an EPA-certified engine.

Southwire proposes to use diesel fuel in the proposed generator engine. Beginning October 1, 2010, stationary CI ICE subject to 40 CFR 60, Subpart IIII with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 40 CFR 1090.305 for nonroad diesel fuel [40 CFR 60.4207(b)]. If the stationary CI internal combustion engine is an emergency stationary internal combustion engine, the owner or operator is not required to submit an initial notification. Starting with the model years in table 5 to this subpart, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the owner or operator must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that time [40 CFR 60.4214(b)].

Emergency stationary ICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. Southwire may petition the Division for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if Southwire maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year. For owners and operators of emergency engines meeting standards under 40 CFR 60.4205 but not 40 CFR 60.4204, any operation other than emergency operation, and maintenance and testing as permitted in this section, is prohibited [40 CFR 60.4211(e)].

40 CFR 63- National Emissions Standards for Hazardous Air Pollutants (NESHAP) Subpart A – General Provisions

This regulation contains national emission standards for hazardous air pollutants (NESHAP) established pursuant to section 112 of the Act as amended November 15, 1990. These standards regulate specific categories of stationary sources that emit (or have the potential to emit) one or more hazardous air pollutants listed in this part pursuant to section 112(b) of the Act. Southwire is a major source of HAPs under this regulation and equipment located at the Southwire site are subject to a specified standard under this regulation.

40 CFR 63, NESHAP Subpart B – Requirements for Control Technology Determinations for Major Sources in Accordance With Clean Air Act Sections, Sections 112(g) and 112(j)

The requirements of 40 CFR 63.40 through 40 CFR 63.44 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants after the effective date of section 112(g)(2)(B) (as defined in 40 CFR 63.41) and the effective date of a title V permit program in the State or local jurisdiction in which the major source is (or would be) located unless the major source in question has been specifically regulated or exempted from regulation under a standard issued pursuant to section 112(d), section 112(h), or section 112(j) and incorporated in another subpart of part 63, or the owner or operator of such major source has received all necessary air quality permits for such construction or reconstruction project before the effective date of section 112(g)(2)(B).

According to Application Number 632967, methanol and methyl isobutyl ketone (MIBK) emissions have the potential to exceed section 112(g) provision of major source threshold of 10 tons per year for single HAPs and 25 tons per year for combined HAPs. Therefore, Southwire elects to take operational limits on all extruders and printers added from both modernization projects to control HAPs. Methanol will have a proposed limit of 5.92 tpy, and MIBK will have a proposed limit of 9.68 tpy. The combined HAPs limit will be 24.9 tons per year. Southwire will maintain monthly usages of all inks and on-going calculations of these HAPs to avoid exceeding the proposed limits.

Per an email dated January 25, 2023 from Paige Murphy, Corporate Environmental Manager of *Southwire Company*, the methanol emissions from the CAMV extrusion lines were determined using same as the emission factors used for CV extrusion as stated in existing Permit Condition 6.2.E.18. These factors have already been approved by the Division. The emission factor used to calculate HAP emissions from curing are also pre-approved by the Division. This factor was derived during the 1994 stack testing event that was used to determine other similar emission factors in this permit.

Per an email dated January 25, 2023 from Paige Murphy, Corporate Environmental Manager of *Southwire Company*, MIBK from printing comes from one type of ink which contains one percent MIBK according to its safety data sheet (SDS). Southwire currently uses a total of six (6) different types of ink that have containerized waste. Since the percentage of MIBK in this one ink is so low, the facility assumes that the MIBK content of the waste is negligible for PTE calculations. However for actual emissions, Southwire will calculate MIBK based upon actual ink usage.

The Division will revise the proposed emissions limits for methanol emissions of 5.5 tons per year and single HAP emissions (other than methanol) of 9.9 tons per year for the extruding and printing equipment proposed in Application Number 632967.

40 CFR 63 NESHAP Subpart MMMM – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products

This regulation establishes national emission standards for hazardous air pollutants (NESHAP) for miscellaneous metal parts and products surface coating facilities. It also establishes requirements to demonstrate initial and continuous compliance with the emission limitations [40 CFR 63.3880]. This regulation applies to the surface coating of any miscellaneous metal parts or products, as described in 40 CFR 63.3881(a)(1), and it includes the subcategories listed in 40 CFR 63.3881(a)(2) through (6), except as provided in 40 CFR 63.3881(c) and that is a major source, is located at a major source, or is part of a major source of emissions of HAP. Southwire is a major source of HAPs.

Per 40 CFR 63.3881(c)(2), surface coating operations that occur at research or laboratory facilities, or is part of janitorial, building, and facility maintenance operations, or that occur at hobby shops that are operated for noncommercial purposes are not subject to 40 CFR 63, Subpart MMMM. Coatings used in volumes of less than 189 liters (50 gal) per year, provided that the total volume of coatings exempt under 40 CFR 63.3381(c)(3) does not exceed 946 liters (250 gal) per year at the facility are also not subject to 40 CFR 63, Subpart MMMM. According to Application Number 632967 new armoring line printers (P3040 – P3052) will be subject to NESHAP Subpart MMMM.

An affected source is a new affected source if you commenced its construction after August 13, 2002 and the construction is of a completely new miscellaneous metal parts and products surface coating facility where previously no miscellaneous metal parts and products surface coating facility had existed [40 CFR 63.3882(c)]. An affected source is reconstructed if it meets the criteria as defined in 40 CFR 63.3882(d)]. An affected source is existing if it is not new or reconstructed [40 CFR 63.3882(e)]. A source is the collection of all of the items listed as follows that are used for surface coating of miscellaneous metal parts and products within each subcategory (1) All coating operations as defined in 40 CFR 63.3981; (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed; (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation [40 CFR 63.3882(b)(1) through (b)(4)]. Therefore all applicable limits will apply to armoring line printers (P3040 – P3052) and associated equipment as described in 40 CFR 63.3882(b)(1) through (b)(4).

An existing source, must limit organic HAP emissions to the atmosphere from the affected source to the applicable limit specified in 40 CFR 63.3890(b)(1) through (5), except as specified in 40 CFR 63.3890(c), determined according to the requirements in 40 CFR 63.3941[Compliant Material Option] or 40 CFR 63.3951 [Emission Rate without Add-On Controls Option]. Since Southwire does not propose to install add-on control options as defined in 40 CFR 63.3981, there is no need to discuss the Emission Rate with Add-On Controls Option as specified in 40 CFR 63.3961. Southwire can comply with this limit by one of the alternatives in 40 CFR 63.3890(c)(1) [Predominant Activity Emission Limit] or 40 CFR 63.3890(c)(2) [Facility-Specific Emission Limit].

Coating processes associated with P316 will meet the general use definition in 40 CFR 63.3981. *General use coating* means any material that meets the definition of coating but does not meet the definition of high performance coating, rubber-to-metal coating, magnet wire coating, or extreme performance fluoropolymer coating as defined in 40 CFR 63.3981. For each existing general use coating affected source, organic HAP emissions are limited to no more than 2.6 pound (lb) organic HAP per gallon (gal) coating solids used during each 12-month compliance period [40 CFR 63.3890(b)(1)]. Armoring line printers (P3040 – P3052) must also comply with 40 CFR 63, Subpart A – General Provision as specified in Table 2 of 40 CFR 63, Subpart MMMM [40 CFR 63.3901].

No operating limits (40 CFR 63.3892(a) or 40 CFR 63.3893(a)) are applicable because armoring line printers (P3040 – P3052) will not be equipped with add-on controls as defined in 40 CFR 63.3981.

Part 63, Chapter I, Title 40 of the Code of Federal Regulations (40 CFR 63) National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart ZZZZ- Standards for Stationary Reciprocating Internal Combustion Engines (RICE)

This regulation is applicable to RICEs that are located at a major source of hazardous air pollutants (HAPs) [40 CFR 63.6585].

Emergency stationary RICE means any stationary RICE whose operation is limited to emergency situations and required testing and maintenance. Examples include stationary RICE used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or stationary RICE used to pump water in the case of fire or flood, etc. Stationary RICE used for peak shaving are not considered emergency stationary RICE. Stationary RICE used to supply power to an electric grid or that supply power as part of a financial arrangement with another entity are not considered to be emergency engines [40 CFR 63.6675].

A new stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source commenced construction or reconstruction on or after June 12, 2006 [40 CFR 63.6590(a)(2)(ii)]. Therefore, the new emergency generator meets the definition of a new RICE.

Emergency stationary RICE means any stationary RICE whose operation is limited to emergency situations and required testing and maintenance [40 CFR 63.6675]. Per 40 CFR 63.6590(c), a new emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions complies with the requirements of 40 CFR 63, Subpart ZZZZ by meeting the requirements of 40 CFR part 60 Subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under 40 CFR 63, Subpart ZZZZ.

40 CFR 63 NESHAP Subpart DDDDD – Standards for Industrial, Commercial, and Institutional Boilers and Process Heaters

This regulation is applicable to any industrial, commercial, or institutional boiler or process heater as defined in 40 CFR 63.7575 that is located at, or is part of, a major source of HAP, except as specified in 40 CFR 63.7491.

Per 40 CFR 63.7575, a unit designed to *burn gas 1 subcategory* includes any boiler or process heater that burns only natural gas, refinery gas, and/or other gas 1 fuels. Gaseous fuel boilers and process heaters that burn liquid fuel for periodic testing of liquid fuel, maintenance, or operator training, not to exceed a combined total of 48 hours during any calendar year, are included in this definition. Gaseous fuel boilers and process heaters that burn liquid fuel during periods of gas curtailment or gas supply interruptions of any duration are also included in this definition. The proposed steam generators (P7057 & P7058) and humidifiers (P7059 through P7068), since they each only fire natural gas, are considered to be in the burn gas 1 subcategory. Propane vaporizers (P480 and P481) are also considered to be in the burn gas 1 subcategory.

Boilers and process heaters in the units designed to burn gas 1 fuels subcategory with a heat input capacity of less than or equal to 5 million Btu per hour must complete a tune-up every 5 years as specified in 40 CFR 63.7540. Boilers and process heaters in the units designed to burn gas 1 fuels subcategory with a heat input capacity greater than 5 million Btu per hour and less than 10 million Btu per hour must complete a tune-up every 2 years as specified in 40 CFR 63.7540. Boilers and process heaters in the units designed to burn gas 1 fuels subcategory are not subject to the emission limits in Tables 1 and 2 or Tables 11 through 15 to this subpart, or the operating limits in Table 4 to 40 CFR 63, Subpart DDDDD [40 CFR 63.7500(e)].

Southwire must submit all of the notifications in 40 CFR 63.7(b) and (c), 63.8(e), (f)(4) and (6), and 63.9(b) through (h) that apply by the dates specified [40 CFR 63.7545(a)] For units that are subject only to a requirement to conduct subsequent annual, biennial, or 5-year tune-up according to 40 CFR 63.7540(a)(10), (11), or (12), respectively, and not subject to emission limits or Table 4 operating limits, the facility is required to submit only an annual, biennial, or 5-year compliance report, as applicable, as specified in 40 CFR 63.7550(b)(1) through 40 CFR 63.7550(b)(4), instead of a semi-annual compliance report[40 CFR 63.7550(b)]. Southwire must keep records of each notification and report that is submitted to comply with this regulation including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that is submitted, according to the requirements of 40 CFR 63.10(b)(2)(xiv) [40 CFR 63.7555(a)(1)].

## 40 CFR 64 – Continuous Compliance Monitoring (CAM)

Units that are considered pollutant specific emission units (PSEUs) under this regulation are (1) subject to a pollutant emission standard for which there is a control device and (2) the pre-control potential emissions for the pollutant is greater than the major source threshold. This regulation requires facilities to prepare and submit monitoring plans for certain emission units with the Title V application. The CAM Plans provide an on-going and reasonable assurance of compliance with applicable emission limits. It has previously been determined that the original Quenching and Cooling System (Q467) has precontrolled emissions above the applicable major source threshold. Therefore, CAM is applicable to Q467 for VOC emissions. According to Application Number 632967, Title V Operating Permit Amendment 3357-045-0008-V-05-2 determined that the Quenching and Cooling System (Q467) required a CAM plan. Since there are no changes to Q467, a new CAM plan will not be submitted as part of this application.

Georgia Rule for Air Quality Control (Georgia Rule) 391-3-1-.02(2)(b) – Emission Limitations and Standards Visible Emissions

This regulation limits opacity to less than forty (40) percent, except as may be provided in other more restrictive or specific rules or subdivisions of Georgia Rule 391-3-1-.02(2). This limitation applies to direct sources of emissions such as stationary structures, equipment, machinery, stacks, flues, pipes, exhausts, vents, tubes, chimneys or similar structures. All equipment being added to the permit as part of this modification are subject to this regulation, with exception to the steam generators, humidifiers and vaporizers.

Georgia Rule 391-3-1-.02(2)(d) – Emission Limitations and Standards Fuel Burning Equipment This regulation limits particulate emissions from fuel burning equipment. The steam generators, vaporizers and humidifiers are subject to Georgia Rule 391-3-1-.02(2)(d)2.(i) because they are fuel burning sources with a heat input less than 10 x 10⁶ Btu/hr [9.98 x 10⁶ Btu/hr per unit for the steam generators, 0.88 x 10⁶ Btu/hr per unit for the vaporizers, and 0.996 x 10⁶ Btu/hr per unit for the humidifiers] and were constructed after January 1, 1972. Georgia Rule 391-3-1-.02(2)(d)2.(i) limits PM emissions based on the following equation:

P = 0.5 pounds per million Btu heat input

The steam generators (P7057 & P7058), humidifiers (P7059 – P7068) and vaporizers (P480 and P481) added in this project are subject to these PM limits in Rule (d). Georgia Rule 391-3-1-.02(2)(d)3.(i) limits opacity from fuel-burning equipment constructed or extensively modified after January 1, 1972 to less than twenty percent except for one six minute period per hour of not more than twenty-seven percent opacity.

Georgia Rule 391-3-1-.02(2)(e) – Emission Limitations and Standards – Particulate Emission from Manufacturing Processes

Georgia Rule 391-3-1-.02(2)(e)1(i) limits a source of particulate emissions that will be put into operation or extensively altered after July 2, 1968. Georgia Rule 391-3-1-.02(2)(e)1(i) limits PM emissions based on the following equations:

 $E = 4.1P^{0.67}$ ; for process input weight rate up to and including 30 tons per hour.

 $E = 55P^{0.11}$  - 40; for process input weight rate greater than 30 tons per hour.

In the equation, E is the emission rate in pounds per hour and P is the process input weight rate in tons per hour. All equipment being added to the permit as part of this modification are subject to this regulation, with exception to the steam generators.

Georgia Rule 391-3-1-.02(2)(g) – Emission Limitations and Standards Sulfur Dioxide

This regulation regulates fuel sulfur content, by weight. This regulation is applicable to the boilers at this facility. All fuel burning sources below 100 million British Thermal Units (Btus) of heat input per hour shall not burn fuel containing more than 2.5 percent sulfur, by weight. The diesel fuel-fired Emergency Generator P824, natural gas-fired Steam Generators P7057 and P7058, propane-fired Vaporizers P480 and P481, and natural gas-fired Humidifiers P7059 –through P7068 added in this application are subject to Rule (g) and will be able to comply with this regulation based on the fuel usage.

*Georgia Rule 391-3-1-.02(2)(tt) – VOC Emissions from Major Sources* 

This regulation is applicable to equipment at the Southwire Title I site because potential volatile organic compounds (VOC) emissions from Georgia Rule (tt) activities on a combined basis exceed 100 tons per year (tpy), and is located in a designated county, Carroll County. This regulation requires all sources in Carroll County that have the potential to emit 100 tpy of VOC to install Reasonably Available Control Technology (RACT). As part of the Title V renewal, Southwire updated its RACT Plan to include applicable equipment. The following discussion and table below only address the RACT determinations for the affected emission units amended in this modification per Application Number 632967.

## Copper Rod Mill

The VOC emissions from the Rod Mill Shaft Furnaces, Cooling and Quenching, and miscellaneous combustion sources are addressed collectively for the determination of RACT as their emissions are interrelated. In the 2016 revised VOC RACT plan, the agency approved that the existing vapor recovery system and shaft furnace be deemed RACT for emissions from the Rod Mill. Since the new vapor recovery system (C4003) and shaft furnaces (F4001 and F4002) are of similar build and functionality as the equipment they are replacing and the capture system will have a greater efficiency than the current system, Southwire proposes that the new Rod Mill vapor capture and control system is sufficient to be considered RACT.

## Plastics Blending, Extrusion and Curing

A review of available controls and previous RACT determinations revealed that there are currently no controls in use for plastic extrusion processes similar to those at Southwire. There are determinations for polystyrene and polyethylene foam, but Southwire does not use polystyrene or polyethylene foam for any of the insulated products at Carrollton. Also, no similar blending (or mixing) or curing operations were identified in the RBLC database. Therefore, "no control" as the VOC RACT has been approved by the agency for these units.

### **Ink Application Systems**

Southwire and its ink vendors have made several attempts to formulate low-VOC inks for the use in the ink application systems. The primary problems hampering the development of low-solvent printing materials are the material on which Southwire is printing (plastic) and line speed requirements. Plastic insulation requires inks with certain adhesive properties that are not available in water and soy-based inks. Also, the extrusion line operating speed does not support the longer drying time required by these inks.

Southwire's ink vendor has developed some low- and no-VOC inks and make-up solutions by replacing much of the solvent with acetone (a non-VOC solvent). Based on use of these inks over the last several years, the low/no-VOC inks are not technically feasible in all cases. Southwire uses low-VOC and non-VOC inks where there is no impact to product quality and/or customer satisfaction, the ink dries quickly enough before the wire passes into the cooling water trough, and the ink is not cost prohibitive. Since low-VOC materials cannot be used in all applications, Southwire asserts that RACT for printing activities is "no controls."

#### Drawing Machines/Annealers

A search of available controls and RACT determinations indicated that there are currently no control technologies currently being applied to wire drawing and annealing. Therefore, "no control" as the VOC RACT has been approved by the agency for these units.

#### Miscellaneous Sources

Southwire operates numerous small emission units with negligible VOC emissions. The units include MC armoring operations and various small fuel burning sources. Potential VOC emissions from each of these sources are expected to be less than 1.0 tpy. Considering the low potential emissions from these sources, "no control" as the VOC RACT has been approved by the agency for these units.

The following table, included in Application Number 632967, summarizes the proposed RACT for the proposed modification.

Old Source Code	New Source Code	Emission Unit Description	RACT
F409	F4001, F4002	Rod Mill Shaft Furnaces	Vapor Recovery System and Shaft Furnaces
Q467	F4003	Rod Mill Quenching & Cooling	Shart Furnaces
F438,	F4004,	Rod Mill Holding Furnace & Other	No Controls
etc	etc	Misc. Comb	NO CONTIONS
Various	Various	Plastics Blending & Manufacturing	No Controls
Various	Various	Plastic Extrusion	No Controls
Various	Various	Ink Application Systems	Low-VOC Ink Where Feasible; Otherwise No Controls
Various	Various	Drawing Machines/Annealers	No Controls
Various	Various	Miscellaneous	No Controls

Table 4-1. VOC RACT

Georgia Rule 391-3-1-.02(2)(vv) – Volatile Organic Liquid Handling and Storage

This regulation applies to volatile organic liquid handling located in the listed counties and prohibits the transfer of any volatile organic liquid other than gasoline from any delivery vessel into a stationary storage tank of greater than 4,000 gallons, unless the tank be equipped with submerged fill pipes. Southwire is located in Carroll County, a listed county. According to Application Number 632967, *IPA Storage Tank ST1 is subject to this regulation because the tank capacity is greater than 4,000 gallons.* 

Georgia Rule 391-3-1-.02(2)(mmm) –  $NO_x$  Emissions from Stationary Gas Turbines and Stationary Engines used to Generate Electricity

This regulation applies to gas turbines and stationary engines with a nameplate capacity of 100 kilowatts or greater up to 25 megawatts located in the listed counties and specifies NO_x emission limits for such sources. Southwire is located in Carroll County, a listed county.

This regulation and its emission limits are not applicable to stationary engines that meet any emission limit exemptions specified in the rule. This regulation exempts emergency standby stationary engines that meet the definition in *Georgia Rule 391-3-1-.02(2)(mmm)4.(i)*. An emergency standby engine is defined in the rule as an engine that operates only when electric power from the local utility is not available and which operates less than 200 hours per year. Proposed Engine P824 meets this definition, and therefore is not subject to the emission limits in this rule.

^{*} Only the affected emission sources for this modification are listed in this RACT. The full RACT can be found in permit 3357-045-0008-V-05-0

Per Georgia Rule 391-3-1-.03(2)(c), the Division may specify conditions under which the facility must be operated in or to comply with the Clean Air Act and State rules and regulations. The Division will require the facility to comply with all applicable rules, regulations and existing permit limitations for all equipment proposed to be removed as part of this modification until such equipment is removed from the facility. In addition, the facility will not be allowed to operate the new shaft furnaces (F4001 and F4002) at the same time. The alternate furnace can be used only when the other furnace is taken down for maintenance and/or repairs.

#### Georgia Air Toxics Guidelines Assessment

According to the State's Guideline for Ambient Impact Assessment of Toxic Air Pollutant (TAP)Emissions (Revised March 2017), existing facilities that require a State Implementation Plan (SIP) permit that are either adding new equipment or modifying existing equipment that results in an increase in the emission of specified toxic air pollutants must demonstrate compliance with the Allowable Ambient Concentration (AAC) for each air toxic. If the facility-wide annual emission rate of a given toxic air pollutant (TAP) is less than the Minimum Emission Rate (MER) no further analysis is required. However, if the facility-wide emission rate exceeds the MER, the facility must show that the resulting maximum ground-level concentration (MGLC) determined by air dispersion analysis does not exceed the ACC of the TAP in question.

The facility submitted as part of Application Number 632967 a toxic impact assessment (TIA) which was reviewed. According to Application Number 632967, the proposed new emission units (extruders, curing ovens, printers, and rodmill) emit six pollutants that are identified as TAPs within Appendix A of EPD's *Guideline* (Acetophenone, Cumene, Isopropyl Alcohol (IPA), Methanol, Methyl Ethyl Ketone (MEK) and Methyl Isobutyl Ketone (MIBK)). Due to the presence of non-typical vertical point sources (rain caps) in the analysis, none of these pollutants were excluded from the analysis based upon emission rate comparison with MER. IPA is emitted from a typical vertical (no rain cap) stack; since annual emissions of IPA did exceed the Minimum Emission Rate (MER), modeling for this pollutant was also included. None of the other modeled pollutants exceeded their respective MER.

The Division's Data Management Unit (DMU) reviewed the submitted TIA. The results of this DMU's review are summarized in the table below.

**Table 1. TAP MGLC Assessment** 

TAP	Averaging Period	AAC	Max Modeled	Receptor UTM Zone: <u>16</u>	
IAP		$(\mu g/m^3)$	Conc. (µg/m³)	Easting (meter)	Northing (meter)
Acetophenone	24-hour	117	1.59	679,269.00	3,715,431.33
Cumene	Annual	400	0.06	679,286.50	3,715,419.50
Iconropyl Alachal	24-hour	2,333	56.72	679,857.50	3,714,583.50
Isopropyl Alcohol	15-minute	98,000	120.42	679,700.00	3,714,400.00
Methanol	Annual	20,000	57.53	679,244.50	3,715,521.00
Methanor	15-minute	32,800	1,632.11	679,234.33	3,715,607.33
MEK	Annual	5,000	25.34	679,525.00	3,716,144.00
MEK	15-minute	88,500	665.95	679,234.33	3,715,607.33
MIBK	Annual	3,000	43.55	679,208.67	3,715,700.67
WIIDK	15-minute	30,700	1,877.81	679,200.00	3,715,700.00

## D. Permit Conditions

Table 3.1.3 was added to add equipment per this modification.

The following table summarizes the proposed changes to permit conditions in Section 3.0 of this permit.

Condition No.	Deleted/ Modified /Added	Condition Description	Reason for Changes
		Facility-Wide [MUL]	[I]
3.2.A.1	Modified	This condition specifies PM ₁₀ PSD avoidance limit for applicable equipment	This condition was modified to remove equipment from this condition that was not present on-site or would be removed from the facility.
3.2.A.2	Modified	This condition specifies VOC PSD avoidance limit for applicable equipment	This condition was modified to remove equipment from this condition that was not present on-site or would be removed from the facility.
3.2.A.3	Modified	This condition specifies PM _{2.5} PSD avoidance limit for applicable equipment	This condition was modified to remove equipment from this condition that was not present on-site or would be removed from the facility.
3.2.A.4	Deleted	This condition specifies PM PSD avoidance limit for applicable equipment added in Modernization 1.	This condition was removed since the facility has revised the PM PSD avoidance limit to address equipment added in Modernization Projects 1 and 2.
3.2.A.5	Deleted	This condition specifies VOC PSD avoidance limit for applicable equipment added in Modernization 1.	This condition was removed since the facility has revised the VOC PSD avoidance limit to address equipment added in Modernization Projects 1 and 2.
3.2.A.6	Deleted	This condition specifies PM ₁₀ PSD avoidance limit for applicable equipment added in Modernization 1.	This condition was removed since the facility has revised the PM ₁₀ PSD avoidance limit to address equipment added in Modernization Projects 1 and 2.
3.2.A.7	Modified	List out all equipment removed from the facility as a result of the proposed Modernization Project.	This condition was modified to add all equipment that are planning to be removed in Modernization 2 in addition to equipment to be removed in Modernization 1.
3.2.A.8	Added	PM ₁₀ PSD avoidance limit for all drawing machines, extruders, and rod mill furnaces located at MC, BWP, UPP, and CRM added during Modernization Projects 1 and 2.	This condition was added to specify the PM ₁₀ PSD avoidance limit for all drawing machines, extruders, and rod mill furnaces located at MC, BWP, UPP, and CRM added in Modernization Projects 1 and 2.
3.2.A.9	Added	PM _{2.5} PSD avoidance for all drawing machines, extruders, and rod mill furnaces located at MC, BWP, UPP, and CRM added during Modernization Projects 1 and 2.	This condition was added to specify the PM _{2.5} PSD avoidance limit for all drawing machines, extruders, and rod mill furnaces located at MC, BWP, UPP, and CRM added in Modernization Projects 1 and 2.

Condition	Deleted/		
No.	Modified /Added	Condition Description	Reason for Changes
	Added	VOC PSD avoidance for all	This condition was added to specify the
		drawing machines, extruders, and	VOC PSD avoidance limit for all drawing
3.2.A.10		rod mill furnaces located at MC,	machines, extruders, and rod mill furnaces
		BWP, UPP, and CRM added during	located at MC, BWP, UPP, and CRM
		Modernization Projects 1 and 2.	added in Modernization Projects 1 and 2.
	Added	Single HAP 112(g) avoidance limit	This condition was added to specify the
		for all printers located at MC, BWP,	single HAP 112(g) avoidance limit for all
3.2.A.11		and UPP added during	printers located at MC, BWP, and UPP
		Modernization Projects 1 and 2.	added during Modernization Projects 1 and 2.
	Added	Combined HAPs 112(g) avoidance	This condition was added to specify the
		limit for all printers, CAMV	combined HAPs 112(g) avoidance limit for
3.2.A.12		extrusion lines, and curing ovens	all printers, CAMV extrusion lines, and
3.2.71.12		located at MC, BWP, and UPP	curing ovens located at MC, BWP, and
		added during Modernization	UPP added during Modernization Projects
	M 1:C: 1	Projects 1 and 2.	1 and 2.
	Modified	This condition requires the facility to comply with all rules until	This condition was modified to add Application Number 632967 to the
3.5.A.1		applicable equipment has been	Application Number 632967 to the condition.
		removed from the facility.	Condition.
3.2.A.2	Added	This condition requires the	This condition was added to require
		operation of control equipment for	applicable equipment added during
		applicable equipment added during	Modernization Projects 1 and 2 to operate
		Modernization Projects 1 and 2 to	control equipment during operation.
		operate control equipment during	
		operation.  Building Wire Plant [B	WP1
		This condition specifies metal	This condition was modified to add and
3.2.B.3	Modified	processing limitations for	remove applicable equipment as specified
		applicable Drawing Machines.	in Modernization 1 and 2 projects.
	• 	Metal Clad [MC]	
		This condition specifies the organic	This condition was modified to add new
3.3.C.5	Modified	HAP emission limit per 40 CFR 63,	armoring line printers added during the
		Subpart MMMM.	Modernization 1 and 2 projects.
2266	M 1101 1	This condition specifies coating	This condition was modified to add new
3.3.C.6	Modified	requirements per 40 CFR 63,	armoring line printers added during the
		Subpart MMMM. This condition specifies	Modernization 1 and 2 projects.
3.3.C.7	Modified	This condition specifies applicability of 40 CFR 63, Subpart	This condition was modified to add new armoring line printers added during the
3.3.C.1	Modified	MMMM.	Modernization 1 and 2 projects.
	1	Copper Rod Mill [CR	1 5
		_	This condition was modified to state that
2201	Modifical	This condition specifies VOC PSD	its requirements will become null and void
3.2.D.1	Modified	avoidance limit for the existing Rod	once the existing Rod Mill equipment has
		Mill equipment.	been fully removed from the facility.
		This condition limited metal	This condition was deleted because
3.2.D.2	Deleted	processing on Drawing Machine	Drawing Machine P477 was never
		P477.	installed.

Condition	Deleted/	TITLE V SIGNIFICANT MODIFICA	
No.	Modified /Added	Condition Description	Reason for Changes
3.2.D.3	Deleted	This condition specified VOC PSD avoidance limit for the Rod Mill.	This condition was removed since the facility has revised the VOC PSD avoidance limit to address the Rod Mill added in Modernization Projects 1 and 2.
3.2.D.4	Deleted	This condition specified PM/PM ₁₀ /PM _{2.5} PSD avoidance limits for the Rod Mill.	This condition was removed since the facility has revised the PM/PM ₁₀ /PM _{2.5} PSD avoidance limit to address the Rod Mill added in Modernization Projects 1 and 2.
3.3.D.1	Added	Specifies general applicability of 40 CFR 63 Subpart DDDDD for the vaporizers added in Modernization Projects 1 and 2.	This condition specifies applicability of 40 CFR 63, Subpart DDDDD to Vaporizers P480 and P481 added in Modernization Projects 1 and 2.
3.3.D.2	Added	Specifies requirements per 40 CFR 63 Subpart DDDDD for the vaporizers added in Modernization Projects 1 and 2.	This condition specifies requirements per 40 CFR 63 Subpart DDDDD for Vaporizers P480 and P481 added in Modernization Projects 1 and 2.
3.3.D.3	Added	Specifies tune-up requirements for the vaporizers per 40 CFR 63 Subpart DDDDD.	This condition specifies tune-up requirements for Vaporizers P480 and V481 per 40 CFR 63 Subpart DDDDD added in Modernization Projects 1 and 2.
3.4.D.3	Modified	This condition specifies Georgia Rule (g) applicability for the Rod Mill.	This condition was modified to remove the Vertirod Process (F476) since the equipment was never installed.
3.4.D.9	Added	This condition specifies Georgia Rule (vv) requirements for Storage Tank ST1.	This condition was added to specify the requirements of Georgia Rule (vv) to Storage Tank ST1.
3.4.D.10	Added	This condition specifies Georgia Rule (d) applicability for the vaporizers.	This condition was added to add applicability of Georgia Rule (d) to Vaporizers P480 and P481.
		Utility Products Plant [	
3.2.E.9	Added	This condition specifies methanol 112(g) avoidance limits for CAMV Extruders and curing ovens at the UPP added in Modernization Projects 1 and 2.	This condition was added to specify methanol 112(g) avoidance limits for the CAMV Extruders and Curing Ovens at the UPP added in Modernization Projects 1 and 2.
3.3.E.10	Added	This condition specifies operating limitations for the steam generators and humidifiers added in Modernization Projects 1 and 2.	This condition was added operating limitations the steam generators and humidifiers added in Modernization Projects 1 and 2.
3.3.E.6	Added	Specifies general applicability of 40 CFR 63 Subpart DDDDD for the steam generators and humidifiers added in Modernization Projects 1 and 2.	This condition specifies applicability of 40 CFR 63, Subpart DDDDD to Steam Generators P7057 and P7058 and Humidifiers P7059 through P7068 added in Modernization Projects 1 and 2.
3.3.E.7	Added	Specifies requirements per 40 CFR 63 Subpart DDDDD for the steam generators and humidifiers added in	This condition specifies requirements per 40 CFR 63 Subpart DDDDD for the steam generators and humidifiers added in

Condition	Deleted/		
Condition No.	Modified /Added	Condition Description	Reason for Changes
		Modernization Projects 1 and 2.	Modernization Projects 1 and 2.
3.3.E.8	Added	Specifies tune-up requirements for steam generators (P7057 and P7058) per 40 CFR 63 Subpart DDDDD.	This condition specifies tune-up requirements for steam generators (P7057 and P7058) per 40 CFR 63 Subpart DDDDD added in Modernization Projects 1 and 2.
3.3.E.9	Added	Specifies tune-up requirements for humidifiers (P7059 through P7068) per 40 CFR 63 Subpart DDDDD.	This condition specifies tune-up requirements for humidifiers (P7059 through P7068) per 40 CFR 63 Subpart DDDDD added in Modernization Projects 1 and 2.
3.4.E.2	Deleted	This condition specified the particulate emissions limitations per Georgia Rule (d) for the flame burners.	This condition was deleted because the requirements of this regulation have been added to Permit Condition 3.2.E.4.
3.4.E.4	Modified	This condition specifies applicability of Georgia Rule (d)for the applicable equipment.	This condition was modified to add applicable steam generators, humidifiers, and vaporizers added in Modernization Projects 1 and 2 as well to particulate matter emission limitations for the flame burners and additional equipment added per this permit modification.
3.4.E.5	Modified	This condition specifies applicability of Georgia Rule (g).	This condition was modified to add applicable steam generators and humidifiers added in Modernization Projects 1 and 2.
3.5.E.1	Modified	This condition specifies applicable maintenance schedule for filters.	This condition was modified to change reference to bin vent filters to fabric filters.
3.5.E.2	Modified	This condition specifies operation of applicable control equipment for applicable drawing machines added in Modernization Projects 1 and 2.	This condition was modified to add applicable equipment added in Modernization Projects 1 and 2.
		Cofer Technology Center	[CTC]
3.2.G.1	Modified	This condition limits daily operating parameters for the fire chambers.	This condition was modified to remove P912 and P913 since this equipment has been removed. This condition was also revised to remove the operation scenario heading, since it is no longer applicable.
3.2.G.2	Modified	This condition limits daily operating parameters for the fire chambers.	This condition was modified to remove P912 and P913 since this equipment has been removed. This condition was also revised to remove the operation scenario heading, since it is no longer applicable.
3.2.G.3	Modified	This condition requires operation of applicable control equipment when the fire chamber is in operation.	This condition was modified to remove P912 and P913 since this equipment has been removed. This condition was also revised to remove the operation scenario heading, since it is no longer applicable.

Condition No.	Deleted/ Modified	Condition Description	Reason for Changes
1,00	/Added		
3.2.G.4	Modified	This condition specifies opacity limits per the Georgia Toxics Guidelines and Georgia Rule (b).	This condition was revised to remove the operation scenario heading, since it is no longer applicable.
3.2.G.8	Deleted	This condition limited operation of the flame chambers.	This condition was deleted as it is no longer applicable since P912 and P913 have been removed.
3.2.G.9	Deleted	This condition limited the daily testing parameters for the flame clambers.	This condition was deleted as it is no longer applicable since P912 and P913 have been removed.
3.2.G.10	Deleted	This condition limited the 12 consecutive month testing parameters for the flame clambers.	This condition was deleted as it is no longer applicable since P912 and P913 have been removed.
3.2.G.11	Deleted	This condition required the operation of applicable control equipment during the operation of the fire chambers.	This condition was deleted as it is no longer applicable since P912 and P913 and associated control equipment have been removed.
3.2.G.12	Deleted	This condition specified operating limitations for the fire chambers.	This condition was deleted as it is no longer applicable since P912 and P913 have been removed.
3.3.G.1	Deleted	This condition addressed general applicability of 40 CFR 63, Subpart DDDDD to P911.	This condition has been deleted since P911 is no longer onsite.
3.3.G.2	Deleted	This condition addressed emission limits per 40 CFR 63, Subpart DDDDD for P911.	This condition has been deleted since P911 is no longer onsite.
3.3.G.3	Deleted	This condition addressed operating standards per 40 CFR 63, Subpart DDDDD for P911.	This condition has been deleted since P911 is no longer onsite.
3.4.G.2	Modified	This condition specifies the applicability of Georgia Rule (g) to applicable equipment.	This condition has been modified to remove P911 since P911 is no longer onsite.
3.4.G.3	Deleted	This condition specifies opacity limits per Georgia Rule (d) to P911.	This condition has been deleted since P911 is no longer onsite.
3.4.G.4	Deleted	This condition specifies PM emission limits per Georgia Rule (d) to P911.	This condition has been deleted since P911 is no longer onsite.
		Corporate Energy Management	Center [CEM]
3.2.H.1	Modified	This condition limits the operating hours of emergency generators in avoidance of Georgia Rule (mmm).	This condition was modified to add the new Generator P824.
3.2.H.2	Modified	This condition limits the purpose of operation of emergency generators in avoidance of Georgia Rule (mmm).	This condition was modified to add the new Generator P824.
3.2.H.3	Deleted	This condition limited the operating hours of Generators P804, P805 and P806.	This condition was deleted since Generators P804, P805 and P806 have been removed.
3.3.H.1	Deleted	This condition specified general	This condition was deleted since

Condition No.	Deleted/ Modified /Added	Condition Description	Reason for Changes
		applicability of 40 CFR 63, Subpart ZZZZ to Generators P804, P805 and P806.	Generators P804, P805 and P806 have been removed.
3.3.H.2	Modified	This condition specified general applicability of 40 CFR 63, Subpart ZZZZ to applicable generators.	This condition was modified to add Generator P824.
3.3.H.3	Deleted	This condition specified formaldehyde emissions limits per 40 CFR 63, Subpart ZZZZ to Generators P804, P805 and P806.	This condition was deleted since Generators P804, P805 and P806 have been removed.
3.3.H.4	Deleted	This condition specified control equipment operation standards per 40 CFR 63, Subpart ZZZZ to Generators P804, P805 and P806.	This condition was deleted since Generators P804, P805 and P806 have been removed.
3.3.H.5	Deleted	This condition specified emissions limit and work practice standards applicability per 40 CFR 63, Subpart ZZZZ to Generators P804, P805 and P806.	This condition was deleted since Generators P804, P805 and P806 have been removed.
3.3.H.6	Deleted	This condition specified control equipment work practice standards applicability per 40 CFR 63, Subpart ZZZZ to Generators P804, P805 and P806.	This condition was deleted since Generators P804, P805 and P806 have been removed.
3.3.H.7	Deleted	This condition specified general applicability of 40 CFR 60, Subpart JJJJ to Generators P804, P805 and P806.	This condition was deleted since Generators P804, P805 and P806 have been removed.
3.3.H.8	Deleted	This condition specified formaldehyde emissions limits per 40 CFR 60, Subpart JJJJ to Generators P804, P805 and P806.	This condition was deleted since Generators P804, P805 and P806 have been removed.
3.3.H.9	Modified	This condition specified general applicability of 40 CFR 60, Subpart IIII to applicable generators.	This condition was modified to add Generator P824.
3.3.H.23	Added	This condition specifies fuel usage requirements per 40 CFR 60, Subpart IIII to applicable generators.	This condition was added to address the applicability of 40 CFR 60, Subpart IIII to Generators P807 and P824.
3.3.H.24	Added	This condition specifies emergency engine operation requirements per 40 CFR 60, Subpart IIII.	This condition was added to address the applicability of 40 CFR 60, Subpart IIII emergency engines definition to Generator P824.
3.4.H.1	Modified	This condition specifies applicability of Georgia Rule (b) to applicable equipment.	This condition was modified to remove P804, P805, P806 and add Generator P824.
3.4.H.2	Deleted	This condition specified applicability of Georgia Rule (g) to	This condition was deleted since Generators P804, P805 and P806 have

Condition	Deleted/ Modified	Condition Description	Reason for Changes
No.	/Added	Condition Description	reason for changes
		Generators P804, P805 and P806.	been removed.
		This condition specified	This condition was deleted since
3.4.H.3	Deleted	applicability of Georgia Rule (mm)	Generators P804, P805 and P806 have
		to Generators P804, P805 and P806.	been removed.
		This condition specified fuel usage	This condition was removed since the
3.4.H.4	Deleted	requirements per 40 CFR 60,	requirements of this regulation are now
		Subpart IIII to Generator P807.	addressed by Condition 3.3.H.23.
2.5.11.1	D 1 4 1	This condition specified control	This condition was deleted since
3.5.H.1	Deleted	equipment operations for Generators P804, P805 and P806.	Generators P804, P805 and P806 have been removed.
	T	Tools and Assembled Production	
2211	D-1-4-1	The condition specified the organic	This condition has been deleted since P970
3.3.I.1	Deleted	HAP emission limits per 40 CFR 63, Subpart MMMM for P970.	has been removed.
		The condition specified the coatings	This condition has been deleted since P970
3.3.I.2	Deleted	requirements per 40 CFR 63,	has been removed.
3.3.1.2	Defeteu	Subpart MMMM for P970.	has been removed.
		The condition specified general	This condition has been deleted since P970
3.3.I.3	Deleted	applicability of applicability of 40	has been removed.
		CFR 63 Subpart MMMM to P970.	
		The condition specified the organic	This condition has been deleted since P970
3.3.I.4	Deleted	HAP emission limits per 40 CFR	has been removed.
		63, Subpart MMMM for P970.	
		The condition specified the coatings	This condition has been deleted since P970
3.3.I.5	Deleted	requirements per 40 CFR 63,	has been removed.
		Subpart MMMM for P970.	
2412	Dalatid	The condition are 10 d	This and dien has have deleted the PO70
3.4.I.3	Deleted	The condition specified the	This condition has been deleted since P970
		emission limits per Georgia Rule (tt) for P970.	has been removed.
3.4.I.4	Deleted	The condition specified the	This condition has been deleted since P970
J.¬.1.¬	Defetted	requirements per Georgia Rule (tt)	has been removed.
		for P970.	
3.4.I.5	Deleted		This condition was removed as it is
		This condition specified	addressed in existing Permit Condition
		applicability of Georgia Rule (e).	3.4.I.1.
3.4.I.6	Deleted	This condition specified	This condition was removed as it is
		applicability of Georgia Rule (b).	addressed in existing Permit Condition
		applicationity of Georgia Ruic (b).	3.4.I.2.

## V. Testing Requirements (with Associated Record Keeping and Reporting)

## Facility Wide

Testing Methods have been updated to reflect the proposed changes associated with this modification.

## Copper Rod Mill

After this issuance of this proposed permit modification, the facility will be required to conduct performance testing for the Rod Mill Shaft Furnace F4001 and Rod Mill Shaft Furnace F4002 to demonstrate compliance with the new PM₁₀ and PM_{2.5} PSD avoidance limits discussed above. During such testing, the facility will be required to establish emission factors in terms of pounds of applicable pollutant emitted per ton of copper charged. The Division will require submittal of the emissions factors to the Division for approval prior to using them to determine PM₁₀ and PM_{2.5} emissions from the furnaces.

## Corporate Energy Management

Waukesha Engines P804, P805, and P806 have been removed from the facility. Therefore, all testing associated with this equipment will be deleted per this permit modification.

The following table summarizes the proposed changes to permit conditions in Section 4.0 of this permit.

Condition No.	Deleted/ Modified /Added	Condition Description	Reason for Changes
		Facility-Wide [MUL]	[I]
4.3.1.s	Deleted	This condition specified the testing method for nitrogen oxides emissions from Generators P804, P805 and P806 to demonstrate compliance with PSD avoidance limits and Georgia Rule (mmm).	This condition was deleted since Generators P804, P805, and P806 have been removed from the facility.
4.3.1.t	Deleted	This condition specified the testing method for Generators P804, P805 and P806 to demonstrate compliance with PSD avoidance limits and Georgia Rule (mmm).	This condition was deleted since Generators P804, P805, and P806 have been removed from the facility.
4.3.1.u	Deleted	This condition specified the testing sampling point locations for Generators P804, P805 and P806 to demonstrate compliance with 40 CFR 63, Subpart ZZZZ.	This condition was deleted since Generators P804, P805, and P806 have been removed from the facility.
4.3.1.v	Deleted	This condition specified applicable testing stack parameters for Generators P804, P805 and P806 to demonstrate compliance with 40 CFR 63, Subpart ZZZZ.	This condition was deleted since Generators P804, P805, and P806 have been removed from the facility.
4.3.1.w	Deleted	This condition specified applicable testing stack parameters for Generators P804, P805 and P806 to demonstrate compliance with 40 CFR 63, Subpart ZZZZ.	This condition was deleted since Generators P804, P805, and P806 have been removed from the facility.

Condition No.	Deleted/ Modified /Added	Condition Description	Reason for Changes
4.3.1.x	Deleted	This condition specified testing methods for formaldehyde emissions from Generators P804, P805 and P806 to demonstrate compliance with 40 CFR 63, Subpart ZZZZ.	This condition was deleted since Generators P804, P805, and P806 have been removed from the facility.
4.3.1.y	Deleted	This condition specified testing methods for organic HAP emissions from Generators P804, P805 and P806 to demonstrate compliance with 40 CFR 63, Subpart ZZZZ.	This condition was deleted since Generators P804, P805, and P806 have been removed from the facility.
4.3.1.hh	Modified	This condition lists testing methods to determine particulate matter emissions from the Rod Mill Shaft Furnaces (F4001 and F4002).	This condition is being modified to allow an alternative per EPA guidance to determine particulate matter emissions from the Rod Mill Shaft Furnaces (F4001 and F4002).
		Copper Rod Mill [CR	M]
4.2.D.1	Modified	This condition requires performance testing for the Rod Mill Shaft Furnace F4001 and Rod Mill Shaft Furnace F4002 to demonstrate compliance with PM ₁₀ and PM _{2.5} PSD avoidance limits.	This condition was modified to require the determination of PM ₁₀ and PM _{2.5} emission factors which will be used to calculate applicable PM ₁₀ and PM _{2.5} emissions from the Rod Mill Shaft Furnace F4001 and the Rod Mill Shaft Furnace F4002 to determine if PM ₁₀ and PM _{2.5} emissions comply with applicable PSD avoidance limits added in Modernization Projects 1 and 2.
		Corporate Energy Management	I .
4.2.H.1	Deleted	This condition specified testing parameters per 40 CFR 63, Subpart ZZZZ for Generators P804, P805 and P806.	This condition was deleted since Generators P804, P805 and P806 have been removed.
4.2.H.2	Deleted	This condition specified equation usage requirements per 40 CFR 63, Subpart ZZZZ for Generators P804, P805 and P806.	This condition was deleted since Generators P804, P805 and P806 have been removed.
4.2.H.3	Deleted	This condition specified control equipment requirements per 40 CFR 63, Subpart ZZZZ for Generators P804, P805 and P806.	This condition was deleted since Generators P804, P805 and P806 have been removed.
4.2.H.4	Deleted	This condition specified engine load requirements per 40 CFR 63, Subpart ZZZZ for Generators P804, P805 and P806.	This condition was deleted since Generators P804, P805 and P806 have been removed.
4.2.H.5	Deleted	This condition specified engine load requirements per 40 CFR 63, Subpart ZZZZ for Generators P804, P805 and P806.	This condition was deleted since Generators P804, P805 and P806 have been removed.

Condition No.	Deleted/ Modified /Added	Condition Description	Reason for Changes
4.2.H.6	Deleted	This condition specified initial compliance testing requirements per 40 CFR 63, Subpart ZZZZ for Generators P804, P805 and P806.	This condition was deleted since Generators P804, P805 and P806 have been removed.
4.2.H.7	Deleted	This condition specified testing standards per 40 CFR 60, Subpart JJJJ for Generators P804, P805 and P806.	This condition was deleted since Generators P804, P805 and P806 have been removed.
4.2.H.8	Deleted	This condition specified VOC testing methods per 40 CFR 60, Subpart JJJJ for Generators P804, P805 and P806.	This condition was deleted since Generators P804, P805 and P806 have been removed.
4.2.H.9	Deleted	This condition specified performance testing schedules per 40 CFR 60, Subpart JJJJ for Generators P804, P805 and P806.	This condition was deleted since Generators P804, P805 and P806 have been removed.

## VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

#### **Building Wire Plant**

Applicable control equipment are required to develop a preventative maintenance plan to ensure proper operation. This requirement is an existing requirement already included in the permit. Applicable permit conditions will be updated to add the names of applicable control equipment being added or removed as part of this modification. In addition, existing bin vent inspection requirements will be updated to include applicable equipment added as a result of this modification.

#### Metal Clad

Applicable control equipment are required to develop a preventative maintenance plan to ensure proper operation. This requirement is an existing requirement already included in the permit. Applicable permit conditions will be updated to add the names of applicable control equipment being added as part of this modification.

## Copper Rod Mill

The facility is required to develop a preventative maintenance plan to ensure proper operation of applicable control equipment. This requirement is an existing requirement already included in the permit. Applicable permit conditions will be deleted from the permit as part of this modification since the applicable equipment was never installed.

Southwire is proposing to change the recording frequency for the data collection for applicable Scrubber C4001 operating parameter indicators currently required. The facility will conduct testing as discussed above. During such testing, a baseline of the Scrubber C4001 operating parameters (pressure drop and scrubbant flow rate ranges) will be determined during the test and will be monitored thereafter to demonstrate the scrubber's performance according to Application 632967. Until the stack test results have been approved by the Division, Southwire will continue to use the currently approved monitoring for C4001.

Applicable equipment has been added as part of this modification that must comply with tune-up requirements per 40 CFR 63, Subpart DDDDD. The tune-up requirements have been added for these sources.

## **Utility Products Plant**

The facility is required to develop a preventative maintenance plan to ensure proper operation of applicable control equipment. This requirement is an existing requirement already included in the permit. Applicable permit conditions will be updated to add the names of applicable control equipment being added as part of this modification.

Applicable equipment has been added as part of this modification that must comply with tune-up requirements per 40 CFR 63, Subpart DDDDD. The tune-up requirements have been added for these sources.

## Corporate Energy Center

Since Generators P804, P805 and P806 have been removed from the facility; all applicable monitoring will be removed from the permit.

## **Tool and Assembled Products**

Since Blade Coating P790 has been removed from the facility; all applicable monitoring will be removed from the permit.

The following table summarizes the proposed changes to permit conditions in Section 5.0 of this permit.

Condition No.	Deleted/ Modified /Added	Condition Description	Reason for Changes
		Building Wire Plant [B	WP]
5.2.B.1	Modified	This condition requires the facility to develop a preventative maintenance plan for applicable control equipment.	This condition was modified to add any equipment added during this modification or to delete any equipment deleted during this modification.
5.2.B.2	Modified	This condition requires bin vent filter inspections for applicable equipment.	This condition was modified to add any equipment added during this modification.
5.2.B.3	Modified	This condition requires maintenance of bin vent filter inspections logs for applicable equipment.	This condition was modified to add any equipment added during this modification.
		Metal Clad [MC]	
5.2.C.1	Modified	This condition requires the facility to develop a preventative maintenance plan for applicable control equipment.	This condition was modified to add any equipment added during this modification.
		Copper Rod Mill [CR	<u>M</u> ]
5.2.D.1	Deleted	This condition requires the facility to develop a preventative maintenance plan for applicable control equipment.	This condition was deleted since Oil Mist Eliminator C478 was never installed.
5.2.D.4	Modified	This condition specifies the operating parameters for Scrubber C4001.	This condition has been revised to change the data reading requirements from once every 8-hour period to once every 12-hour period.
5.2.D.5	Added	This condition requires the establishment of a pressure loss range for Scrubber C4001 for representative operation of the scrubber using data from the pressure loss monitoring device required by 5.2.D.4 during initial performance testing.	This condition was added based on the proposed monitoring requirements included in Application Number 632967 for Scrubber C4001.
5.2.D.6	Added	This condition specifies the tune-up requirements for Vaporizers P480 and P481 per 40 CFR 63, Subpart DDDDD.	This condition was added to add monitoring requirements for Vaporizers P480 and P481 per 40 CFR 63, Subpart DDDDD,
		Utility Products Plant [	
5.2.E.2	Modified	This condition requires a log of applicable control equipment	This condition was modified to reference fabric filters instead of bin vent filters for

Condition No.	Deleted/ Modified /Added	Condition Description	Reason for Changes	
		preventative maintenance.	applicable equipment.	
5.2.E.3	Modified	This condition requires the facility to develop a preventative maintenance plan for applicable control equipment.	This condition was modified to add any equipment added during this modification.	
5.2.E.5	Added	This condition specifies the tune-up requirements for Steam Generators (P7057 and P7058) and Humidifiers (P7059 – P7068) per 40 CFR 63, Subpart DDDDD,	This condition was added to add monitoring requirements for Steam Generators (P7057 and P7058) and Humidifiers (P7059 – P7068) per 40 CFR 63, Subpart DDDDD,	
		Cofer Technology Center	[CTC]	
5.2.G.1	Modified	This condition specifies the daily operating monitoring for the fire chambers.	This condition was modified to remove Fire Chambers P912 and P913 since these sources have been removed.	
5.2.G.2	Modified	This condition requires monitoring of applicable Scrubber parameters used to control emissions from the fire chambers.	This condition was modified to remove Scrubber C912 and Fire Chambers P912 and P913 since these sources have been removed.	
5.2.G.3	Deleted	This condition required the establishment of the initial flow rate and differential pressure range for applicable equipment.	This condition was deleted since Scrubber C912 has been removed and the required parameters have been established for Scrubber C951, per Application Number 632967.	
5.2.G.4	Deleted	This condition specified a schedule for operating scenarios.	This condition has been deleted since the operation scenarios are no longer applicable.	
5.2.G.5	Deleted	This condition specified the tune-up requirements for Boiler P911 per 40 CFR 63, Subpart DDDDD,	This condition has been deleted since Boiler P911 has been removed.	
		Corporate Energy Manageme		
5.2.H.1	Deleted	This condition specified Georgia Rule (III) monitoring requirements for Generators P804, P805, and P806.	This condition was deleted since Generators P804, P805 and P806 have been removed.	
5.2.H.2	Deleted	This condition specified continuous monitoring requirements for Generators P804, P805, and P806 per 40 CFR 63, Subpart ZZZZ.	This condition was deleted since Generators P804, P805 and P806 have been removed.	
5.2.H.3	Deleted	This condition specified continuous monitoring systems requirements for Generators P804, P805, and P806 per 40 CFR 63, Subpart ZZZZ.	This condition was deleted since Generators P804, P805 and P806 have been removed.	
5.2.H.4	Deleted	This condition specified pressure drop monitoring requirements for Generators P804, P805, and P806 per 40 CFR 63, Subpart ZZZZ.	This condition was deleted since Generators P804, P805 and P806 have been removed.	
Tools and Assembled Products [TAP]				

Condition No.	Deleted/ Modified /Added	Condition Description	Reason for Changes
5.2.I.1	Deleted	This condition specified monitoring requirements for P790 per 40 CFR 63, Subpart MMMM.	This condition was deleted since P790 been removed.

## VII. Other Record Keeping and Reporting Requirements

#### Facility Wide

The facility must now update applicable record keeping requirements to address applicable updated emissions limits/operating standards discussed above in this document.

## **Building Wire Plant**

The facility must now update applicable record keeping requirements to address applicable updated emissions limits/operating standards for the Building Wire Plant discussed above in this document.

## Metal Clad Facility

The facility must now update applicable record keeping requirements to address applicable updated emissions limits/operating standards for the Metal Clad Facility discussed above in this document.

## Copper Rod Mill

The facility must now update applicable record keeping requirements to address applicable updated emissions limits/operating standards for the Copper Rod Mill discussed above in this document. In addition, since Vertirod F476 and Drawing Machine P477 have been removed from the facility, all applicable associated recordkeeping will be removed from the permit.

## **Utility Products Plant**

The facility must now update applicable record keeping requirements to address applicable updated emissions limits/operating standards for the Utility Products Plant discussed above in this document.

## Cofer Technology Center

The facility must now update applicable record keeping requirements to address applicable updated emissions limits/operating standards for the Cofer Technology Center discussed above in this document. In addition, since Flame Chambers P912 and P913 will not be installed and Boiler P911 has been removed from the facility, all applicable associated recordkeeping will be removed from the permit.

#### Corporate Energy Center

The facility must now update applicable record keeping requirements to address applicable updated emissions limits/operating standards for the Corporate Energy Center discussed above in this document. In addition, since Generators P804, P805 and P806 have been removed from the facility, all applicable associated recordkeeping will be removed from the permit.

#### Tool and Assembled Products

The facility must now update applicable record keeping requirements to address applicable updated emissions limits/operating standards for the Tool and Assembled Products discussed above in this document. In addition, since Blade Coating P970 has been removed from the facility, all applicable associated recordkeeping will be removed from the permit.

The following table summarizes the proposed changes to permit conditions in Section 6.0 of this permit.

Condition No.	Deleted/ Modified /Added	Condition Description	Reason for Changes
	1	Facility-Wide [MUL7	
6.1.A.7	Modified	This condition specifies the reporting of applicable facility-wide excess emissions, exceedances, or excursions.	This condition was modified to add and remove exceedances reporting in reference to applicable emission/operating limits resulting from this proposed modification.
6.2.A.1	Modified	This condition requires monthly materials usage records for applicable equipment.	This condition was modified to remove and add equipment per this modification.
6.2.A.3	Modified	This requires monthly rod input for applicable equipment.	This condition was modified to remove and add equipment per this modification.
6.2.A.4	Modified	This requires calculations of monthly VOC emissions for applicable equipment.	This condition was modified to remove and add equipment per this modification.
6.2.A.5	Modified	This condition requires monthly plastic throughput records for applicable equipment.	This condition was modified to remove and add equipment per this modification.
6.2.A.6	Modified	This requires calculations of monthly VOC emissions for applicable equipment.	This condition was modified to remove and add equipment per this modification.
6.2.A.7	Modified	This requires calculations of 12-month rolling VOC emissions for applicable equipment.	This condition was modified to remove and add equipment per this modification.
6.2.A.8	Modified	This requires calculations of monthly PM ₁₀ and PM _{2.5} emissions for applicable equipment.	This condition was modified to remove and add equipment per this modification.
6.2.A.9	Modified	This condition requires monthly material throughput records for applicable equipment.	This condition was modified to remove and add equipment per this modification.
6.2.A.10	Modified	This requires calculations of monthly PM ₁₀ and PM _{2.5} emissions for applicable equipment.	This condition was modified to remove and add equipment per this modification.
6.2.A.11	Modified	This requires calculations of 12-month rolling PM ₁₀ and PM _{2.5} emissions for applicable equipment.	This condition was modified to remove and add equipment per this modification.
6.2.A.12	Modified	This condition requires reporting of removed equipment resulting from Modernization Projects 1 and 2.	This condition was modified to add Application Number 632967.
6.2.A.13	Modified	This condition requires reporting of constructed equipment resulting from Modernization Projects 1 and 2.	This condition was modified to add Application Number 632967.
6.2.A.14	Added	This condition requires monthly materials usage records for applicable equipment.	This condition was added to address records needed to comply with applicable HAP emissions limits added per this

Condition No.	Deleted/ Modified /Added	Condition Description	Reason for Changes
			modification.
6.2.A.15	Added	This condition requires calculation of monthly HAP emissions from applicable equipment.	This condition was added to address records needed to comply with applicable HAP emissions limits added per this modification.
6.2.A.16	Added	This requires calculations of 12-month rolling individual HAP and combined HAPs emissions for applicable equipment.	This condition was added to require applicable equipment added during Modernization Projects 1 and 2 to operate control equipment during operation.
		Building Wire Plant [B	WP]
6.1.B.7	Modified	This condition specifies the reporting of applicable BWP excess emissions, exceedances, or excursions.	This condition was modified to add exceedances reporting in reference to applicable emission/operating limits resulting from this proposed modification.
6.2.B.7	Modified	This condition requires monthly materials usage records for applicable equipment.	This condition was modified to add equipment per this modification.
6.2.B.8	Modified	This requires calculations of monthly $PM_{10}$ and $P_{2.5}$ emissions for applicable equipment.	This condition was modified to add equipment per this modification.
6.2.B.9	Modified	This condition requires monthly lubricant usage records for applicable equipment.	This condition was modified to add equipment per this modification.
		Metal Clad [MC]	
6.1.C.7	Modified	This condition specifies the reporting of applicable MC excess emissions, exceedances, or excursions.	This condition was modified to add exceedances reporting in reference to applicable emission/operating limits resulting from this proposed modification.
6.2.C.8	Deleted	This condition required lubricant usage records for Drawing Machine P332.	This condition was deleted because P332 has been removed from the facility.
6.2.C.12	Modified	This condition requires maintenance of records of usage of VOC containing materials.	This condition was modified to add equipment added per this modification.
6.2.C.13	Modified	This condition requires maintenance of records of usage of VOC containing materials and associated applicable calculations.	This condition was modified to add equipment added per this modification.
6.2.C.14	Modified	This condition requires submittal of a compliance report per the requirements of 40 CFR 63, Subpart MMMM.	This condition was modified to add equipment added per this modification.
6.2.C.15	Modified	This condition specifies record keeping requirements per 40 CFR 63, Subpart MMMM.	This condition was modified to add equipment added per this modification.
6.2.C.16	Modified	This condition specifies record keeping schedule requirements per 40 CFR 63, Subpart MMMM.	This condition was modified to add equipment added per this modification.

Condition No.	Deleted/ Modified /Added	Condition Description	Reason for Changes
		Copper Rod Mill [CR	M]
6.1.D.7	Modified	This condition specifies the reporting of applicable CRM excess emissions, exceedances, or excursions.	This condition was modified to remove exceedances reporting in reference to applicable emission/operating limits removed and equipment per this proposed modification. This condition was also modified to update Scrubber C4001 excursions reporting resulting from the proposed modification.
6.2.D.4	Deleted	This condition required monthly material usage records for the Vertirod F476.	This condition was deleted because Vertirod F476 was never installed.
6.2.D.5	Deleted	This condition required calculation of monthly VOC emissions for the Vertirod F476.	This condition was deleted because Vertirod F476 was never installed.
6.2.D.6	Deleted	This condition required calculation of monthly PM ₁₀ and PM _{2.5} emissions from Vertirod F476.	This condition was deleted because Vertirod F476 was never installed.
6.2.D.7	Deleted	This condition required lubricant usage records for Drawing Machine P477.	This condition was deleted because Drawing Machine P477 was never installed.
6.2.D.11	Added	This condition requires maintenance of monthly copper charged records for Rod Mill Shaft Furnaces (F4001 and/or F4002).	This condition was added to help demonstrate compliance with applicable PSD avoidance limits associated with this modification.
6.2.D.12	Added	This condition requires calculation of monthly PM ₁₀ emissions from Rod Mill Shaft Furnaces (F4001 and/or F4002).	This condition was added to help demonstrate compliance with applicable PSD avoidance limits associated with this modification.
6.2.D.13	Added	This condition requires calculation of twelve month rolling PM ₁₀ emissions from Rod Mill Shaft Furnaces (F4001 and/or F4002).	This condition was added to help demonstrate compliance with applicable PSD avoidance limits associated with this modification.
6.2.D.14	Added	This condition requires calculation of monthly PM _{2.5} emissions from Rod Mill Shaft Furnaces (F4001 and/or F4002).	This condition was added to help demonstrate compliance with applicable PSD avoidance limits associated with this modification.
6.2.D.15	Added	This condition requires calculation of twelve month rolling PM _{2.5} emissions from Rod Mill Shaft Furnaces (F4001 and/or F4002).	This condition was added to help demonstrate compliance with applicable PSD avoidance limits associated with this modification.
6.2.D.16	Added	This condition requires records of tune-ups for the vaporizers (P480 and P481) per 40 CFR 63, Subpart DDDDD.	This condition was added to add equipment added in Modernization Projects 1 and 2.
6.2.D.17	Added	This condition requires compliance reports for the vaporizers (P480 and P481) per 40 CFR 63, Subpart	This condition was added to add equipment added in Modernization Projects 1 and 2.

Condition No.	Deleted/ Modified /Added	Condition Description	Reason for Changes
		DDDDD.	
		Utility Products Plant [	UPP]
6.1.E.7	Modified	This condition specifies the reporting of applicable UPP excess emissions, exceedances, or excursions.	This condition was modified to remove exceedances reporting for control equipment that has been removed from this modification. In addition, this condition was modified to add exceedances reporting in reference to applicable emission/operating limits resulting from this proposed modification. This condition was also modified to add excursions reporting for control equipment that has been added from per this modification.
6.2.E.27	Modified	This condition requires calculation of monthly VOC emissions from applicable equipment.	This condition was modified to add equipment added per this modification.
6.2.E.31	Added	This condition requires monthly moisture-cured XLPE throughput for applicable equipment.	This condition was added to track usage records for applicable equipment added per this modification.
6.2.E.32	Added	This condition requires records of tune-ups for steam generators (P7057 and P058) and humidifiers (P7059 through P7068) per 40 CFR 63, Subpart DDDDD.	This condition was added to add equipment added in Modernization Projects 1 and 2.
6.2.E.33	Added	This condition requires compliance reports for steam generators (P7057 and P058) and humidifiers (P7059 through P7068) per 40 CFR 63, Subpart DDDDD.	This condition was added to add equipment added in Modernization Projects 1 and 2.
		Cofer Technology Center	[CTC]
6.1.G.7	Modified	This condition specifies the reporting of applicable CTC excess emissions, exceedances, or excursions.	This condition was modified to remove references to Fire Chambers P912 and P913 from excess emissions and exceedance reporting since this equipment has been removed from the facility. This condition was also modified to remove exceedances reporting for operating scenarios that have been removed per this modification.
6.2.G.1	Modified	This condition requires daily records of flame tests.	This condition was modified to remove P912 and P913 since this equipment has been removed.
6.2.G.2	Modified	This condition requires twelve month rolling total records of flame tests.	This condition was modified to remove P912 and P913 since this equipment has been removed.
6.2.G.5	Deleted	This condition required notification of startup of applicable equipment.	This condition was deleted since the operation scenario is no longer applicable, as well as the removal of Scrubber C912.

Condition No.	Deleted/ Modified /Added	Condition Description	Reason for Changes
6.2.G.6	Deleted	This condition addressed records of tune ups of Boiler P911 per 40 CFR 63, Subpart DDDDD.	This condition has been deleted since P911 is no longer onsite.
6.2.G.7	Deleted	This condition addressed compliance reports for Boiler P911 per 40 CFR 63, Subpart DDDDD.	This condition has been deleted since P911 is no longer onsite.
	•	Corporate Energy Management	
6.1.H.7	Modified	This condition specifies the reporting of applicable CEM excess emissions, exceedances, or excursions.	This condition was modified to remove references to Generators P804, P805 and P806 from exceedances, excursions and other applicable reporting since this equipment has been removed from the facility. This condition was also modified to add exceedances reporting for equipment that was added per this modification.
6.2.H.1	Modified	This condition specifies applicable records for applicable equipment.	This condition was modified to remove references to Generators P804, P805 and P806 since Generators P804, P805 and P806 have been removed.
6.2.H.2	Deleted	This condition specified applicable notifications per 40 CFR 63, Subpart ZZZZ for Generators P804, P805 and P806.	This condition was deleted since Generators P804, P805 and P806 have been removed.
6.2.H.3	Deleted	This condition specified Notification of Intent per 40 CFR 63, Subpart ZZZZ for Generators P804, P805 and P806.	This condition was deleted since Generators P804, P805 and P806 have been removed.
6.2.H.4	Deleted	This condition specified the Notification for Compliance Status report requirement per 40 CFR 63, Subpart ZZZZ for Generators P804, P805 and P806.	This condition was modified to add Generator P824.
6.2.H.5	Deleted	This condition specified records per 40 CFR 63, Subpart ZZZZ for Generators P804, P805 and P806.	This condition was deleted since Generators P804, P805 and P806 have been removed.
6.2.H.6	Deleted	This condition specified records schedules per 40 CFR 63, Subpart ZZZZ for Generators P804, P805 and P806.	This condition was deleted since Generators P804, P805 and P806 have been removed.
6.2.H.8	Deleted	This condition specified maintenance plans per 40 CFR 63, Subpart ZZZZ for Generators P804, P805 and P806.	This condition was deleted since Generators P804, P805 and P806 have been removed.
6.2.H.9	Deleted	This condition specified records schedules per 40 CFR 63, Subpart ZZZZ for Generators P804, P805 and P806.	This condition was deleted since Generators P804, P805 and P806 have been removed.

Condition No.	Deleted/ Modified /Added	Condition Description	Reason for Changes
6.2.H.10	Deleted	This condition specified performance testing records per 40 CFR 63, Subpart ZZZZ for Generators P804, P805 and P806.	This condition was deleted since Generators P804, P805 and P806 have been removed.
		Tools and Assembled Produc	cts [TAP]
6.1.I.7	Deleted	This condition specified the reporting of applicable TAP excess emissions, exceedances, or excursions.	This condition was deleted since Blade Coating P970 has been removed from the facility.
6.2.I.1	Deleted	The condition required records of VOC containing material coatings used on P970.	This condition has been deleted since P970 has been removed.
6.2.I.2	Deleted	The condition required records of applicable material usage for P970.	This condition has been deleted since P970 has been removed.
6.2.I.3	Deleted	The condition required compliance reports per 40 CFR 63, Subpart MMMM for P970.	This condition has been deleted since P970 has been removed.
6.2.I.4	Deleted	The condition required records per 40 CFR 63, Subpart MMMM for P970.	This condition has been deleted since P970 has been removed.
6.2.I.5	Deleted	The condition required records keeping schedule per 40 CFR 63, Subpart MMMM for P970.	This condition has been deleted since P970 has been removed.

## VIII. Specific Requirements

### A. Operational Flexibility

No operational flexibility is not requested as part of this permit modification.

## B. Alternative Requirements

No alternative requirements were added, modified, or removed as a result of this permit modification.

## C. Insignificant Activities

*Insignificant Activities Based on Emission Levels* and *Generic Emissions Groups* have been updated to add and remove applicable equipment associated with this modification as discussed above.

## D. Temporary Sources

No temporary sources were added, modified, or removed as a result of this permit modification.

#### E. Short-Term Activities

No short-term were added, modified, or removed as a result of this permit modification.

## F. Compliance Schedule/Progress Reports

No compliance schedule/progress reports were added, modified, or removed as a result of this permit modification.

## G. Emissions Trading

No emissions trading was added, modified, or removed as a result of this permit modification.

## H. Acid Rain Requirements/CAIR/CSPAR

This permit modification does not change the applicability of Acid Rain Requirements/CAIR/CSAR to this facility.

#### I. Prevention of Accidental Releases

No prevention of accidental releases was added, modified, or removed as a result of this permit modification.

## J. Stratospheric Ozone Protection Requirements

This permit modification does not change the applicability of Stratospheric Ozone Protection Requirements to this facility.

## K. Pollution Prevention

No prevention of pollution prevention was added, modified, or removed as a result of this permit modification.

# L. Specific Conditions

No prevention of specific conditions were added, modified, or removed as a result of this permit modification.

## **Addendum to Narrative**

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//